

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION**

**INDEX OF ALL FILINGS PURSUANT TO LOCAL RULE 81 AND
AS AN EXHIBIT TO THE NOTICE OF REMOVAL (R. Doc. 1)**

Attachment 1	Pleadings and Executed Process Filed in the 341 st Judicial District, Webb County, Texas, Cause No. 2020CVF00022D3
	Plaintiff's Original Petition, Request for Disclosure, Lourdes Rodriguez de Gonzalez's First of Interrogatories to Defendants & Lourdes Rodriguez de Gonzalez's First Request for Production to Defendants
	Civil Case- Calendar Call Settings
	Citation to JLT Transport LLC
	Citation to Ashirwad Group LLC
	Citation to German Rios Jr.
	Citation to Carlos Sanchez
	Citation to Raul Ramirez

	Citation to Weeks Marine
	Citation to German Rios Jr. & Carlos Sanchez Collectively d/b/a C & G Trucking
	Affidavit of Personal Service to Weeks Marine, Inc.
	Affidavit of Service to Raul Ramirez
	Process Server's Return on Carlos Sanchez
	Affidavit of Service of German Rios Jr. & Carlos Sanchez Collectively d/b/a C & G Trucking
	Process Server's Return on German Rios
Attachment 2	Docket Sheet
Attachment 3	List of All Counsel of Record

Respectfully submitted,

/s/ Jennifer A. David

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing document has been forwarded to all counsel of record by hand, electronic filing, email and/or depositing a copy of same in the U.S. mail, postage prepaid and properly addressed this 9th day of March, 2020.

/s/ Jennifer A. David
JENNIFER A. DAVID

ATTACHMENT 1

CAUSE NO. _____

MA LOURDES GONZALEZ INDIVIUALLY, §
 LOURDES RODRIGUEZ DE §
 GONZALEZ INDIVIUDALLY, §
 LESLYLE GONZALEZ INDIVIDUALLY, §
 CYNTHIA GONZALEZ INDIVIDUALLY, §
 LAURA GATICA INDIVIDUALLY §
 ROBERTO GONZALEZ ANCIRA §
 INDIVIDUALLY & AS REPRESENTATIVE §
 OF ESTATE OF ROBERTO GONZALEZ JR. §

Plaintiffs,

IN THE DISTRICT COURT

V.

JUDICIAL DISTRICT

JIT TRANSPORT LLC., §
 ASHIRWAD GROUP LLC, §
 GERMAN RIOS JR. INDIVIDUALLY, §
 & CARLOS SANCHEZ INDIVIDUALLY, & §
 D/B/A C & G TRUCKING, §
 RAUL RAMIREZ, & WEEKS MARINE, INC. §

Defendants.

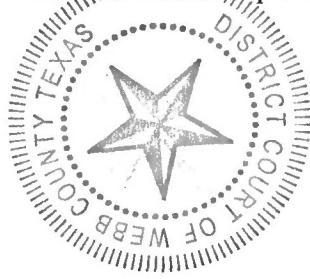
WEBB COUNTY, TEXAS

PLAINTIFFS' ORIGINAL PETITION, REQUEST FOR DISCLOSURE, LOURDES RODRIGUEZ DE GONZALEZ'S FIRST SET OF INTERROGATORIES TO DEFENDANTS & LOURDES RODRIGUEZ DE GONZALEZ'S FIRST REQUEST FOR PRODUCTION TO DEFENDANTS

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW MA LOURDES GONZALEZ, LOURDES RODRIGUEZ DE GONZALEZ, LESLYLE GONZALEZ, CYNTHIA GONZALEZ, LAURA GATICA, ROBERTO GONZALEZ ANCIRA ("Plaintiffs"), in the above-entitled civil action, and file this Original Petition, Request for Disclosure, First Set of Interrogatories to Defendants and First Request for Production to Defendants, complaining of Defendants, JIT TRANSPORT LLC, ASHIRWAD GROUP LLC, GERMAN RIOS JR., CARLOS SANCHEZ, C & G TRUCKING, RAUL RAMIREZ, & WEEKS MARINE, INC., (collectively, "Defendants"), and for their causes of action would respectfully show unto the Court the following:

I. **AMOUNT IN CONTROVERSY**



A True copy of the original. I certify
 the 6th day of March, 2020
 ESTHER DEGOLLADO
 Clerk of the District Courts and
 County Court at Law Webb County, Texas
 By: S. DeGollado Deputy

1. Pursuant to Rule 47 of the Texas Rules of Civil Procedure, Plaintiffs seek monetary relief over \$1,000,000.

II. DISCOVERY

2. Pursuant to Rule 190.4 of the Texas Rules of Civil Procedure, discovery is intended to be conducted under level 3.

III. PARTIES

3. A. MA LOURDES GONZALEZ, Plaintiff in the above-styled numbered cause resides in Ramos Arizpe, Coahuila, Mexico.

B. LOURDES RODRIGUEZ DE GONZALEZ, Plaintiff in the above-styled numbered cause resides in Ramos Arizpe, Coahuila, Mexico.

C. LESLYLE GONZALEZ, Plaintiff in the above-styled numbered cause resides in Ramos Arizpe, Coahuila, Mexico.

D. CYNTHIA GONZALEZ, Plaintiff in the above-styled numbered cause resides in Ramos Arizpe, Coahuila, Mexico.

E. LAURA GATICA, Plaintiff in the above-styled numbered cause resides in Ramos Arizpe, Coahuila, Mexico

F. ROBERTO GONZALEZ ANCIRA, Plaintiff in the above-styled numbered cause resides in Ramos Arizpe, Coahuila, Mexico and brings this wrongful-death and survival action as the parent and on behalf of the estate Decedent ROBERTO GONZALEZ JR., who at the time of death, was a resident of Texas. Currently no administration is pending and none is necessary. *See Shepard v. Ledford, 962 SW2d 28, 31-32 (Tex. 1998)*

G. JIT TRANSPORT LLC, Defendant in the above styled numbered cause is a limited liability company organized and existing under the laws of Texas, doing business in the State of Texas, and may be served with process pursuant to sections 5.201 and 5.255 of the Texas Business

Organizations Code, by serving its registered agent, Shetul B. Muchhala, 101 West Del Mar, Suite 5E, Laredo, Texas 78041 via private process.

H. ASHIRWAD GROUP LLC, Defendant in the above styled numbered cause is a limited liability company organized and existing under the laws of Texas, doing business in the State of Texas, and may be served with process pursuant to sections 5.201 and 5.255 of the Texas Business Organizations Code, by serving its registered agent, Shetul B. Muchhala, 101 West Del Mar, Suite 5E, Laredo, Texas 78041 via private process.

I. GERMAN RIOS JR. & CARLOS SANCHEZ collectively D/B/A C & G TRUCK-ING, Defendant (hereinafter C & G) in the above styled numbered cause is a general partnership which has filed with Webb County an assumed name certificate of ownership as C & G Trucking, does business in the State of Texas, and may be served with process by serving the general partners, German Rios Jr., 1717 B Cortez, Laredo, Texas 78043 and Carlos Sanchez Jr., 4019 Santa Cleotilde, Laredo, Texas, 78041 via private process.

J. GERMAN RIOS JR, Defendant in the above styled numbered cause is an individual who resides in Laredo, Webb County, Texas and may be served with process at 1717 B Cortez, Laredo, Texas 78043 or wherever he may be found via private process.

K. CARLOS SANCHEZ, Defendant in the above styled numbered cause is an individual who resides in Laredo, Webb County, Texas and may be served with process at 4019 Santa Cleotilde, Laredo, Texas, 78041 or wherever he may be found via private process.

L. RAUL RAMIREZ, Defendant in the above styled numbered cause is an individual who resides in Brookshire, Fort Bend County, Texas and may be served with process at 36215 County Line Road, Brookshire, Texas, 77423 or wherever he may be found via private process.

M. WEEKS MARINE, INC., Defendant in the above styled numbered cause is a corporation organized and existing under the laws of New Jersey, doing business in the State of Texas,

and may be served with process pursuant to sections 5.201 and 5.255 of the Texas Business Organizations Code, by serving its registered agent, Thomas P Boynton 11011 Richmond Avenue, Suite 650, Houston, Texas 77042 via private process.

IV. JURISDICTION AND VENUE

4. The subject matter in controversy is within the jurisdictional limits of this court.
5. This court has jurisdiction over the parties because DEFENDANT CARLOS SANCHEZ, DEFENDANT GERMAN RIOS JR., DEFENDANT RAUL RAMIREZ were Texas residents at the time the cause of action accrued.
6. This Court has jurisdiction over Defendant WEEKS MARINE, INC., because said Defendant purposefully availed itself of the privilege of conducting activities in the State of Texas and established minimum contacts sufficient to confer jurisdiction over said Defendant, and the assumption of jurisdiction over Defendant WEEKS MARINE, INC., will not offend traditional notions of fair play and substantial justice and is consistent with the constitutional requirements of due process.
7. Plaintiff would show that the causes of action specified herein arose from or relate to the contacts of Defendant WEEKS MARINE, INC., to the State of Texas, the existence of which confers upon this Court specific jurisdiction over said Defendant.
8. Furthermore, Plaintiff would show that Defendant WEEKS MARINE, INC., engaged in activities constituting business in the State of Texas, as provided by Section 17.042 of the Texas Civil Practice and Remedies Code, in that it: (1) contracted by mail or otherwise with a Texas resident, wherein a party to such contract incurred an obligation to tender performance, in whole or in part, within this state; (2) committed a tort, in whole or in part, in this state; and (3) recruited Texas residents, including but not limited to Defendant RAUL RAMIREZ, directly or through an intermediary located in this state, for employment inside or outside this state.

9. The Court has jurisdiction over Defendant JIT TRANSPORT LLC as it is organized under the laws of the State of Texas and maintains its principal place of business in Laredo, Webb County, Texas.

10. The Court has jurisdiction over Defendant ASHIRWAD GROUP LLC as it is organized under the laws of the State of Texas and maintains its principal place of business in Laredo, Webb County, Texas.

11. The Court has jurisdiction over GERMAN RIOS JR. & CARLOS SANCHEZ D/B/A C & G TRUCKING as it operates as a general partnership doing business in Texas and has filed with Webb County an assumed name certificate of ownership evidencing both Defendant GERMAN RIOS JR. & CARLOS SANCHEZ as general partners and residents of Texas.

12. Venue is proper in Webb County, Texas, pursuant to §§15.001 & 15.002(a) of the Texas Civil Practice and Remedies Code under one or more of the following facts:

- a. German Rios Jr, a natural person, resided in Webb County at the time the cause of action accrued;
- b. Carlos Sanchez, a natural person, resided in Webb County at the time the cause of action accrued;
- c. JIT Transport LLC, a limited liability company, maintained its principal place of business in Webb County at the time the cause of action accrued;
- d. Ashirwad Group LLC, a limited liability company, maintained its principal place of business in Webb County at the time the cause of action accrued;
- e. German Rios Jr. and Carlos Sanchez collectively d/b/a C & G Trucking, a general partnership, maintained its principal place of business in Webb County at the time the cause of action accrued
- f. Jurisdiction is proper in this Court because Plaintiffs are entitled to damages in excess of the minimum jurisdiction of this Court. Specifically, Plaintiffs seek monetary relief over one million dollars (\$1,000,000.00).

V. FACTS OF THE CASE

13. This is a lawsuit for wrongful death damages brought by the surviving family members of the Decedent pursuant to the provisions of Chapter 71 of the Texas Civil Practice & Remedies Code and the legion of Texas cases interpreting liability and damages under said law. *TXI Transportation Co. v. Hughes*, 224 S. W. 3d 870 (Tex. App. — Ft. Worth 2007); *Borth v. Charley's Concrete Co., Inc.*, 139 S. W. 3d 391 (Tex. App. — Ft. Worth 2004); *Star Enterprise v. Marze*, 61 S. W. 3d 449 (Tex. App. — San Antonio 2001). Injuries to the familial relationship are significant and are worthy of compensation because our courts place a high value on human life. *Sanchez v. Schindler*, 651 S. W. 2d 249 (Tex. 1983); *Borth*, 139 S. W. 3d at 396.

14. On January 27, 2020, Decedent ROBERTO GONZALEZ JR. drove a 2006 Freightliner owned by Defendant CARLOS SANCHEZ and GERMAN RIOS JR. which was leased to or under the exclusive control of Defendant JIT TRANSPORT LLC from Laredo, Texas to Topsail Beach, North Carolina. Decedent ROBERTO GONZALEZ JR.'s Freightliner had a flatbed trailer attached to it which was owned by Defendant ASHIRWAD GROUP LLC. The flatbed trailer had several long, large metal pipelines stacked on it for transport between Laredo, Texas to Topsail Beach, North Carolina. The pipelines were to be delivered to a construction site operated by Defendant WEEKS MARINE, INC for the town of Topsail Beach's Channel Dredging and Beach Nourishment Project.

14. At all times, Decedent ROBERTO GONZALEZ JR. was in the course and scope of his employment with JIT Transport LLC and C & G Trucking as a commercial motor vehicle driver employed to transport material or cargo in interstate commerce. As part of his employment, Decedent ROBERTO GONZALEZ JR. was not responsible for loading or unloading transported materials or cargo.

15. After arriving to the construction site operated by Defendant WEEKS MARINE INC., Decedent ROBERTO GONZALEZ JR. safely parked his vehicle at the intersection of Drum Avenue

& Ocean Boulevard and waited for Defendant WEEKS MARINE INC.'s employees or agents to unload the dangerous metal pipeline cargo. Defendant RAUL RAMIREZ worked as a flagger for WEEKS MARINE INC. and was tasked with assisting to unload the dangerous metal pipelines from the flatbed trailer. In order to accomplish this, Defendant WEEKS MARINE INC. instructed another employee, Donny McLeod, to operate a 966 Caterpillar front end loader with a forest machine grapple attachment even though this attachment is not made for the unloading and transportation of 3,000 lb metal pipelines. Defendant RAUL RAMIREZ was assigned the specific job to ensure the construction site safety of all those around by indicating to Donny McLeod when the pipeline was "secure" in the forest machine grapple attachment and safe to maneuver down the road. As Donny McLeod removed the fifth pipe using the 966 Caterpillar front end loader, he heard Defendant RAUL RAMIREZ yell as the sixth 3,000 lb. metal pipe fell off the flatbed trailer onto Decedent ROBERT GONZALEZ Jr.'s person which killed him. Defendant RAUL RAMIREZ failed in his duty to ensure the pipeline left on the flatbed trailer was secure before directing Donny McLeod to maneuver the front end loader down the street and away from the trailer. At all times Defendant RAUL RAMIREZ was in the course and scope of his employment with Defendant WEEKS MARINE INC.

16. Upon information and belief, Defendant ASHIRWAD GROUP LLC loaded the large metal pipeline in an unsafe, unstable manner and allowed the same to be transported in interstate commerce. The flatbed trailer was not equipped with the necessary pipe stakes to ensure that the pipeline would roll off the flatbed trailer during the unloading process. Further, the distribution of weight of the pipeline after loading was improper and the height of the load exceeded that allowed by state and federal rules and regulations.

17. Upon information and belief, Defendant JIT TRANSPORT LLC and C & G TRUCKING did not provide any safety equipment, training, or policies as to the transportation, delivery, and

unloading of the pipeline. Upon information and belief, Defendant JIT TRANSPORT LLC and C & G TRUCKING loaded the large metal pipeline in an unsafe, unstable manner and allowed the same to be transported in interstate commerce. The flatbed trailer was not equipped with the necessary pipe stakes to ensure that the pipeline would not roll off the flatbed trailer during the unloading process. Further, the distribution of weight of the pipeline after loading was improper and the height of the load exceeded that allowed by state and federal rules and regulations.

VI. NEGLIGENCE AS TO DEFENDANT RAUL RAMIREZ

18. The occurrence made the basis of this suit and the resulting injuries and damages were proximately caused by the negligent conduct and activity of Defendant RAUL RAMIREZ in one or more of the following respects:

- a. In failing to keep such lookout as a person of ordinary prudence would have kept under the same or similar circumstances;
- b. In failing to ensure the remaining metal pipelines were secure on the flatbed trailer;
- c. In failing to ensure the front-end loader was safe to maneuver away from the flatbed trailer;
- d. In failing to warn;
- e. In failing to make sure the front-end loader and all equipment, including were in safe condition to operate at the construction site; and
- f. In failing to use the appropriate attachment for the 966 Caterpillar front end loader.

VII. NEGLIGENCE AS TO DEFENDANT JIT TRANSPORT LLC

19. Defendant JIT TRANSPORT LLC hired Decedent ROBERTO GONZALEZ JR. as a commercial motor vehicle driver to transport materials and cargo in interstate commerce. Defendant JIT TRANSPORT LLC owed a duty to Decedent ROBERTO GONZALEZ JR. to furnish him safety equipment for the delivery of cargo to construction sites. Further, Defendant JIT TRANSPORT LLC owed a duty to train, instruct, and supervise Decedent as to the delivery and unloading of the metal pipeline. Defendant JIT Transport LLC had a duty to ensure that the flatbed

trailer was equipped with the necessary pipe stakes so that the pipeline would not roll off the flatbed trailer during the unloading process. Further Defendant JIT Transport LLC had a duty ensure that the distribution of weight of the pipeline after loading was proper and the height of the load did not exceed that allowed by state and federal rules and regulations.

20. Defendant JIT TRANSPORT LLC's acts and omissions, as complained of by Plaintiffs herein, are a proximate cause of Plaintiffs' damages, which are the natural, probable, and foreseeable consequences of Defendant JIT TRANSPORT LLC's said acts and omissions.

VIII. DEFENDANT JIT TRANSPORT LLC AS NON-SUBSCRIBER

21. Defendant JIT TRANSPORT LLC is a non-subscriber to the Workers' Compensation Act, and in accordance with Tex. Lab. Code § 406.033 (a) In an action against an employer who does not have workers' compensation insurance coverage to recover damages for personal injuries or death sustained by an employee in the course and scope of the employment, it is not a defense that:

- (1) the employee was guilty of contributory negligence;
- (2) the employee assumed the risk of injury or death; or
- (3) the injury or death was caused by the negligence of a fellow employee.

22. Plaintiffs are only required to prove one percent (1%) negligence on the part of Defendant JIT TRANSPORT LLC to recover all related damages against Defendant JIT TRANSPORT LLC. Plaintiffs will show that all of the foregoing acts of negligence, commission or omission, or both, separately and collectively, were the proximate causes of the occurrences that form the basis of this suit.

IX. NEGLIGENCE AS TO DEFENDANT GERMAN RIOS JR. & CARLOS SANCHEZ COLLECTIVELY D/B/A C & G TRUCKING

23. Defendant GERMAN RIOS JR. & CARLOS SANCHEZ collectively D/B/A C & G TRUCKING hired Decedent ROBERTO GONZALEZ JR. as a commercial motor vehicle driver

to transport materials and cargo in interstate commerce. Defendant GERMAN RIOS JR. & CARLOS SANCHEZ collectively D/B/A C & G TRUCKING owed a duty to Decedent ROBERTO GONZALEZ JR. to furnish him safety equipment for the delivery of cargo to construction sites. Further, Defendant GERMAN RIOS JR. & CARLOS SANCHEZ collectively D/B/A C & G TRUCKING owed a duty to train, instruct, and supervise Decedent as to the delivery and unloading of the metal pipeline. Defendant GERMAN RIOS JR. & CARLOS SANCHEZ collectively D/B/A C & G TRUCKING had a duty to ensure that the flatbed trailer was equipped with the necessary pipe stakes so that the pipeline would not roll off the flatbed trailer during the unloading process. Further Defendant GERMAN RIOS JR. & CARLOS SANCHEZ collectively D/B/A C & G TRUCKING had a duty to ensure that the distribution of weight of the pipeline after loading was proper and the height of the load did not exceed that allowed by state and federal rules and regulations.

24. Defendant GERMAN RIOS JR. & CARLOS SANCHEZ collectively D/B/A C & G TRUCKING's acts and omissions, as complained of by Plaintiffs herein, are a proximate cause of Plaintiffs' damages, which are the natural, probable, and foreseeable consequences of Defendant GERMAN RIOS JR. & CARLOS SANCHEZ collectively D/B/A C & G TRUCKING's said acts and omissions.

**X. DEFENDANT GERMAN RIOS JR. & CARLOS SANCHEZ COLLECTIVELY
D/B/A C & G TRUCKING AS NON-SUBSCRIBER**

25. Defendant C & G TRUCKING is a non-subscriber to the Workers' Compensation Act, and in accordance with Tex. Lab. Code § 406.033 (a) In an action against an employer who does not have workers' compensation insurance coverage to recover damages for personal injuries or death sustained by an employee in the course and scope of the employment, it is not a defense that:

- (1) the employee was guilty of contributory negligence;
- (2) the employee assumed the risk of injury or death; or

(3) the injury or death was caused by the negligence of a fellow employee.

26. Plaintiffs are only required to prove one percent (1%) negligence on the part of Defendant C & G TRUCKING to recover all related damages against Defendant C & G TRUCKING. Plaintiffs will show that all of the foregoing acts of negligence, commission or omission, or both, separately and collectively, were the proximate causes of the occurrences that form the basis of this suit.

XI. CAUSES OF ACTION AS TO DEFENDANT WEEKS MARINE INC

A. *RESPONDEAT SUPERIOR*

27. Defendant WEEKS MARINE INC is liable to Plaintiffs for the negligent acts of Defendant-Operator RAMIREZ because at the time of the incident described above, Defendant RAMIREZ was the agent, servant and/or employee of Defendant WEEKS MARINE INC, and was acting within the scope of his authority as such agent, servant and/or employee. A Defendant employer will face liability for the negligent torts of its employee if (1) a Plaintiff is injured as the result of a tort; (2) the tortfeasor was an employee of the Defendant, and (3) the tort was committed while the employee was acting within the scope of his employment. *Baptist Mem'l. Hosp. v. Sampson*, 969 S. W. 2d 945, 947 (Tex. 1998) (elements 1-3). A tort is committed while the employee is acting within the scope of his or her employment, and he or she was acting (1) within the employee's general authority, (2) in furtherance of the Defendant's business, and (3) for the accomplishment of the object for which the employee was hired. *Minyard Food Stores v. Goodman*, 80 S.W. 3d 573, 577 (Tex. 2002) (element 3); *Mata v. Andrews Transp.*, 900 S.W. 2d 363, 366 (Tex. App. — Houston [14 th Dist.] 1995, no writ) (element 3).

28. In the present case, Defendant WEEKS MARINE INC is liable for the tortious acts committed by Defendant RAMIREZ because Defendant RAMIREZ was an employee who was within

the course and scope of his employment working for Defendant WEEKS MARINE INC as a flagger. Specifically, on the day in question, Defendant RAMIREZ was acting within the course and scope of his employment as a flagger and in furtherance of Defendant WEEKS MARINE INC's business and was acting for the accomplishment of the object for which RAMIREZ was hired by and/or for Defendant WEEKS MARINE INC.

B. NEGLIGENCE ACTIVITY

29. Defendant WEEKS MARINE INC was negligent in the unloading of the flatbed trailer. Defendant WEEKS MARINE INC failed to ensure that all flatbed trailers maintained the appropriate pipe stakes to ensure safe unloading of the pipeline. Defendant WEEKS MARINE INC was negligent by instructing Defendant RAMIREZ to use an improper piece of machinery, namely the forest machine grapple attachment for the 966 Caterpillar front end loader, to unload the dangerous pipeline.

C. NEGLIGENCE SUPERVISION, HIRING AND/OR RETENTION

30. Defendant WEEKS MARINE INC was negligent in the hiring, retention and/or supervision of Defendant RAMIREZ who was an employee of WEEKS MARINE INC at the time of the events complained of in this suit.

31. Specifically, Defendant WEEKS MARINE INC had a duty to hire, supervise and retain Defendant RAMIREZ as an employee in accordance with all applicable state and federal safety regulations. Accordingly, Defendant WEEKS MARINE INC breached this duty in the following ways:

- a. Hiring Defendant RAMIREZ as an employee when a reasonably prudent operator or employer would not have done so;
- b. Failing to properly supervise Defendant RAMIREZ by ensuring that he complied with all applicable federal and state safety regulations;

- c. Retaining Defendant RAMIREZ in his capacity as a flagger in violation of applicable federal and state safety and regulations when a reasonably prudent operator or employers would not have.
32. As a proximate cause of the Defendants' breaches of the above standards of care, Plaintiff has suffered substantial injury and damages in an amount within the minimum jurisdictional requirements of this Court.

XII. NEGLIGENCE AS TO DEFENDANT AS TO ASHIRWAD GROUP LLC

33. Defendant ASHIRWAD GROUP LLC owned the flatbed trailer involved in the subject incident. Defendant ASHIRWAD GROUP LLC had a duty to ensure the metal pipeline was load, secure, and safe for transportation and unloading upon delivery. Defendant ASHIRWAD GROUP LLC failed in this duty by allowing an unsecure and unsafe load to be transported to North Carolina. Defendant ASHIRWAD GROUP LLC had a duty to ensure that the flatbed trailer was equipped with the necessary pipe stakes so that the pipeline would not roll off the flatbed trailer during the unloading process. Further Defendant ASHIRWAD GROUP LLC had a duty ensure that the distribution of weight of the pipeline after loading was proper and the height of the load did not exceed that allowed by state and federal rules and regulations.

34. Defendant ASHIRWAD GROUP LLC's acts and omissions, as complained of by Plaintiffs herein, are a proximate cause of Plaintiffs' damages, which are the natural, probable, and foreseeable consequences of Defendant ASHIRWAD GROUP LLC's said acts and omissions

XIII. DAMAGES

A. Wrongful Death Claim & Damages

35. MA LOURDES GONZALEZ is the surviving daughter of Decedent ROBERTO GONZALEZ JR. As a result of the Defendants' negligence, carelessness and recklessness, MA LOURDES GONZALEZ has suffered losses by virtue of the destruction of the parent-child relationship, including the right to love, nurture and affection, solace, comfort, companionship, care, education,

guidance, society, emotional support and happiness. Plaintiff has suffered in the past and will likely suffer in the future wrongful death damages including mental anguish, loss of consortium, loss of companionship and society, pecuniary loss, and loss of inheritance.

36. Further, MA LOURDES GONZALEZ has suffered severe mental depression and anguish; and substantial grief and sorrow as a result of the death of her father. Moreover, she is likely to continue to suffer long into the future. Accordingly, MA LOURDES GONZALEZ brings this wrongful death claim pursuant to Tex. Civ. Prac. & Rem. Code § 71.002 and 71.004 known as the Texas Wrongful Death statute.

37. Further, Plaintiff MA LOURDES GONZALEZ further seeks exemplary damages under Tex. Civ. Prac. & Rem. Code § 41.003.

38. LESLYLE GONZALEZ is the surviving daughter of Decedent ROBERTO GONZALEZ JR. As a result of the Defendants' negligence, carelessness and recklessness, LESLYLE GONZALEZ has suffered losses by virtue of the destruction of the parent-child relationship, including the right to love, nurture and affection, solace, comfort, companionship, care, education, guidance, society, emotional support and happiness. Plaintiff has suffered in the past and will likely suffer in the future wrongful death damages including mental anguish, loss of consortium, loss of companionship and society, pecuniary loss, and loss of inheritance.

39. Further, LESLYLE GONZALEZ has suffered severe mental depression and anguish; and substantial grief and sorrow as a result of the death of her father. Moreover, she is likely to continue to suffer long into the future. Accordingly, LESLYLE GONZALEZ brings this wrongful death claim pursuant to Tex. Civ. Prac. & Rem. Code § 71.002 and 71.004 known as the Texas Wrongful Death statute.

40. Further, Plaintiff LESLYLE GONZALEZ further seeks exemplary damages under Tex. Civ. Prac. & Rem. Code § 41.003.

41. CYNTHIA GONZALEZ is the surviving daughter of Decedent ROBERTO GONZALEZ JR. As a result of the Defendants' negligence, carelessness and recklessness, CYNTHIA GONZALEZ has suffered losses by virtue of the destruction of the parent-child relationship, including the right to love, nurture and affection, solace, comfort, companionship, care, education, guidance, society, emotional support and happiness. Plaintiff has suffered in the past and will likely suffer in the future wrongful death damages including mental anguish, loss of consortium, loss of companionship and society, pecuniary loss, and loss of inheritance.

42. Further, CYNTHIA GONZALEZ has suffered severe mental depression and anguish; and substantial grief and sorrow as a result of the death of her father. Moreover, she is likely to continue to suffer long into the future. Accordingly, CYNTHIA GONZALEZ brings this wrongful death claim pursuant to Tex. Civ. Prac. & Rem. Code § 71.002 and 71.004 known as the Texas Wrongful Death statute.

43. Further, Plaintiff CYNTHIA GONZALEZ further seeks exemplary damages under Tex. Civ. Prac. & Rem. Code § 41.003.

44. LAURA GATICA is the surviving spouse of Decedent ROBERTO GONZALEZ JR. As a result of the Defendants' negligence, carelessness and recklessness, LAURA GATICA has suffered losses by virtue of the destruction of the spousal relationship, including the right to love, nurture and affection, solace, comfort, companionship, care, education, guidance, society, emotional support and happiness.

45. Further, LAURA GATICA has suffered severe mental depression and anguish; and substantial grief and sorrow as a result of the death of her spouse. Moreover, she is likely to continue to suffer long into the future. Accordingly, LAURA GATICA brings this wrongful death claim pursuant to Tex. Civ. Prac. & Rem. Code § 71.002 and 71.004 known as the Texas Wrongful Death statute.

46. Further, Plaintiff LAURA GATICA further seeks exemplary damages under Tex. Civ. Prac. & Rem. Code § 41.003.

47. LOURDES RODRIGUEZ DE GONZALEZ is the surviving mother of Decedent ROBERTO GONZALEZ JR. As a result of the Defendants' negligence, carelessness and recklessness, LOURDES RODRIGUEZ DE GONZALEZ has suffered losses by virtue of the destruction of the parent-child relationship, including the right to love, nurture and affection, solace, comfort, companionship, care, education, guidance, society, emotional support and happiness. Plaintiff has suffered in the past and will likely suffer in the future wrongful death damages including mental anguish and loss of consortium.

48. Further, LOURDES RODRIGUEZ DE GONZALEZ has suffered severe mental depression and anguish; and substantial grief and sorrow as a result of the death of her son. Moreover, she is likely to continue to suffer long into the future. Accordingly, LOURDES RODRIGUEZ DE GONZALEZ brings this wrongful death claim pursuant to Tex. Civ. Prac. & Rem. Code § 71.002 and 71.004 known as the Texas Wrongful Death statute.

49. Further, Plaintiff LOURDES RODRIGUEZ DE GONZALEZ further seeks exemplary damages under Tex. Civ. Prac. & Rem. Code § 41.003.

50. ROBERTO GONZALEZ ANCIRA is the surviving father of Decedent ROBERTO GONZALEZ JR. As a result of the Defendants' negligence, carelessness and recklessness, ROBERTO GONZALEZ ANCIRA has suffered losses by virtue of the destruction of the parent-child relationship, including the right to love, nurture and affection, solace, comfort, companionship, care, education, guidance, society, emotional support and happiness. Plaintiff has suffered in the past and will likely suffer in the future wrongful death damages including mental anguish and loss of consortium.

51. Further, ROBERTO GONZALEZ ANCIRA has suffered severe mental depression and anguish; and substantial grief and sorrow as a result of the death of his son. Moreover, he is likely to continue to suffer long into the future. Accordingly, ROBERTO GONZALEZ ANCIRA brings this wrongful death claim pursuant to Tex. Civ. Prac. & Rem. Code § 71.002 and 71.004 known as the Texas Wrongful Death statute.

52. Further, Plaintiff ROBERTO GONZALEZ ANCIRA further seeks exemplary damages under Tex. Civ. Prac. & Rem. Code § 41.003.

B. Survival Claim & Damages

53. As a proximate result of the occurrence made basis of this suit, Decedent ROBERTO GONZALEZ JR. died on January 27, 2020, after being subjected to incomprehensible pain and suffering. Likewise, the Estate of ROBERTO GONZALEZ JR. has paid or incurred liability to pay a reasonable and customary charge for his funeral and burial and reasonable medical expenses. Accordingly, Defendant is liable to the Estate of ROBERTO GONZALEZ JR. for damages including conscious physical pain, pain and mental anguish, medical and funeral expenses, and knowledge of impending death within the jurisdictional limits of this Court. Plaintiff ROBERTO GONZALEZ ANCIRA brings this suit on behalf of the Estate of ROBERTO GONZALEZ JR pursuant to Texas Civil Practice and Remedies Code Section 71.021 known as the Texas Survival Statute.

54. Further, Plaintiff ROBERTO GONZALEZ ANCIRA brings this suit on behalf of the Estate of J. R. further seeks exemplary damages under Tex. Civ. Prac. & Rem. Code § 41.003.

XIV. JURY DEMAND

55. Plaintiff demand a jury trial and have tendered the appropriate fee with the original petition.

XV. REQUEST FOR DISCLOSURES

56. Pursuant to Rule 194 of the Texas Rules of Civil Procedure, Plaintiffs requests that Defendants disclose within fifty (50) days after service of this Petition the information or material described in Rule 194.2 as set forth therein.

XVI. ADDITIONAL DISCOVERY FILED WITH PETITION

57. In accordance with the Texas Rules of Civil Procedure, Plaintiff LOURDES RODRIGUEZ DE GONZALEZ is serving the following discovery upon Defendants in conjunction with Plaintiffs' Original Petition. Defendants have fifty (50) days from the date of service to fully answer and/or respond to the attached:

Exhibit A: Plaintiff LOURDES RODRIGUEZ DE GONZALEZ's First Set of Interrogatories to all Defendants; and

Exhibit B: Plaintiff LOURDES RODRIGUEZ DE GONZALEZ's First Request for Production to all Defendants.

XVII. JOINT AND SEVERAL LIABILITY

58. The Defendants named herein are each jointly and severally liable to Plaintiffs for their damages sustained as a result of the acts and omissions complained of in this suit.

XVIII. PRAAYER

59. WHEREFORE, PREMISES CONSIDERED, Plaintiffs respectfully pray that Defendants be cited to appear and answer herein, and that upon trial of this cause, Plaintiffs have judgment of, from, and against Defendants, jointly and severally, for actual damages, to be determined by a fair and impartial jury that has fully weighed the evidence and facts and delivered its verdict in accordance with the Court's instructions, together with costs of suit, pre-judgment interest, post-judgment interest, attorney fees, and for such other and further relief to which Plaintiff may show themselves justly entitled.

Respectfully submitted,

SADOVSKY & ELLIS, PLLC

8620 N. New Braunfels Ave. Suite 110
San Antonio, Texas 78217
Telephone: (210) 832-9090
Facsimile: (210) 802-4131

By: /s/ Jon B. Ellis
Jon B. Ellis
State Bar No. 24080878
Email: jon@sadovskyellis.com

&

THE ARMSTRONG FIRM, PLLC
Ron W. Armstrong II
State Bar No. 24059394
310 S. St. Mary's St. Ste 2700
San Antonio, Texas 78205
Telephone: (210) 277-0542
Facsimile: (210) 277-0548
Email: rwaai@tafpplc.com

ATTORNEYS FOR PLAINTIFFS
MA LOURDES GONZALEZ
LOURDES RODRIGUEZ DE GONZALEZ &
ROBERTO GONZALEZ ANCIRA

THE CARLSON LAW FIRM
6243 I-10 #205
San Antonio, Texas 78201
Telephone: (210) 696-8600
Facsimile: (210) 802-4131

By: /s/ Brantley W. White
State Bar No. 00789722
Email: bwhite@whiteandcarlson.com
Steve S. Dummitt
State Bar No. 24082936
Email: sdummit@carlsonattorneys.com
Cynthia N. De Santiago
State Bar No. 24090997
cdesantiago@carlsonattorneys.com

ATTORNEYS FOR PLAINTIFFS
LESLYLE GONZALEZ
CYNTHIA GONZALEZ &
LAURA GATICA



HONORABLE BECKIE PALOMO

State District Court Judge

341st JUDICIAL DISTRICT OF TEXAS
WEBB COUNTY JUSTICE CENTER

1110 Victoria Street, Suite 302
Laredo, Texas 78040-4439

CIVIL CASE – CALENDAR CALL SETTINGS

RE: CAUSE NO: 2020CVF000220D3

STYLE: MA LOURDES GONZALEZ INDIVIUALLY, LOURDES RODRIGUEZ DE GONZALEZ INDIVIUDALLY, LESLYLE GONZALEZ INDIVIDUALLY, CYNTHIA GONZALEZ INDIVIDUALLY, LAURA GATICA INDIVIDUALLY, ROBERTO GONZALEZ ANCIRA INDIVIDUALLY & AS REPRESENTATIVE OF ESTATE OF ROBERTO GONZALEZ JR.

VS

JIT TRANSPORT LLC, ASHIRWAD GROUP LLC, GERMAN RIOS JR. INDIVIDUALLY, & CARLOS SANCHEZ INDIVIDUALLY, & D/B/A C & G TRUCKING, RAUL RAMIREZ, & WEEKS MARINE, INC

NOTICE that this case is SET FOR CALENDAR CALL on 04/15/2020 at 1:30 PM at the 341st District Courtroom, 3rd Floor, Webb County Justice Center.

Calendar Call hearings will be in open Court and on the record before JUDGE BECKIE PALOMO. Your presence is MANDATORY unless Counsel for Plaintiff(s) file a Joint Pre-Trial Guideline Order (PTGO) with all counsels signatures on the PTGO.

You may download the PTGO at our website:

http://www.webbcountytx.gov/DC341st/Links/civ_Jury%20PTGO.pdf

Counsel for Plaintiff(s): if you do not appear for calendar call, your case may be dismissed for lack of prosecution.

Counsel for Defendant(s): if you do not appear for calendar call, a pre-trial guideline order may be entered with or without your approval and/or signature.

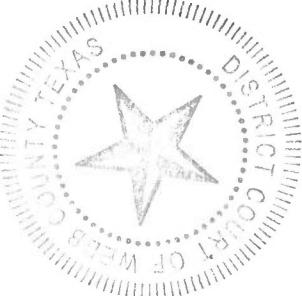
Call the court for jury selection dates and pre-trial hearing dates. Keep in mind jury selection must be set within the timeframes recommended by the Texas Supreme Court.

If there are any questions regarding this matter please feel free to call the court at the number below.

A True copy of the original. I certify
the 6th day of March 20 20²⁰
ESTHER DEGOLLADO
Clerk of the District Courts and
County Court at Law Webb County, Texas
By: Sonia Vela Deputy

A handwritten signature in black ink, appearing to read "Sonia Vela".
Sonia Vela
Civil Court Coordinator
Tel: (956) 523-4483
Fax: (956) 523-5055

SD



**** Transmit Confirmation Report ****

P.1
WEBB CO DISTRICT CLERK Fax:956-523-5121

Feb 4 2020 04:18pm

Name/Fax No.	Mode	Start	Time	Page	Result	Note
912108024131	Fax	04,04:18pm	0'39"	1	*OK	



HONORABLE BECKIE PALOMO

State District Court Judge

341st JUDICIAL DISTRICT OF TEXAS
WEBB COUNTY JUSTICE CENTER
1110 Victoria Street, Suite 302
Laredo, Texas 78040-4439

CIVIL CASE – CALENDAR CALL SETTINGSRE: CAUSE NO: 2020CVF000220D3

STYLE: MA LOURDES GONZALEZ INDIVIDUALLY, LOURDES RODRIGUEZ DE GONZALEZ INDIVIDUALLY, LESLYE GONZALEZ INDIVIDUALLY, CYNTHIA GONZALEZ INDIVIDUALLY, LAURA GATICA INDIVIDUALLY, ROBERTO GONZALEZ ANCIRA INDIVIDUALLY & AS REPRESENTATIVE OF ESTATE OF ROBERTO GONZALEZ JR.

VS

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Call the court for jury selection dates and pre-trial hearing dates. Keep in mind jury selection must be set within the timeframes recommended by the Texas Supreme Court.

If there are any questions regarding this matter please feel free to call the court at the number below.


Sonia Vela
Civil Court Coordinator
Tel: (956) 523-4483
Fax: (956) 523-5095

SERVE
2020CVF000220D3

CITATION

PLAINTIFFS' ORIGINAL PETITION, REQUEST FOR DISCLOSURE, LOURDES RODRIGUEZ DE GONZALEZ'S FIRST SET OF INTERROGATORIES TO DEFENDANTS & LOURDES RODRIGUEZ DE GONZALEZ'S FIRST REQUEST FOR PRODUCTION TO DEFENDANTS

THE STATE OF TEXAS
COUNTY OF WEBB

CALENDAR CALL HEARING SET FOR
04/15/2020 AT 1:30PM

NOTICE TO THE DEFENDANT: "YOU HAVE BEEN SUED. YOU MAY EMPLOY AN ATTORNEY. IF YOU OR YOUR ATTORNEY DO NOT FILE A WRITTEN ANSWER WITH THE CLERK WHO ISSUED THIS CITATION BY 10:00 A.M. ON THE MONDAY NEXT FOLLOWING THE EXPIRATION OF TWENTY DAYS AFTER YOU WERE SERVED THIS CITATION AND PETITION, A DEFAULT JUDGMENT MAY BE TAKEN AGAINST YOU."

TO: JIT TRANSPORT LLC
BY SERVING ITS REGISTERED AGENT SHETUL B. MUCHHALA
101 WEST DEL MAR SUITE 5E
LAREDO TX 78041

DEFENDANT, IN THE HEREINAFTER STYLED AND NUMBERED CAUSE, YOU ARE HEREBY COMMANDED TO APPEAR BEFORE THE 341st District Court of Webb County, Texas, to be held at the said courthouse of said county in the city of Laredo, Webb County, Texas, by filing a written answer to the Petition of Plaintiff at or before 10:00 O'CLOCK A.M. of the Monday next after the expiration of 20 days after the date of service thereof, a copy of which accompanies this citation, in the Cause #: 2020CVF000220D3, styled:

MA LOURDES GONZALEZ INDIVIUALLY, LOURDES RODRIGUEZ DE GONZALEZ INDIVIUDALLY, LESLYLE GONZALEZ INDIVIDUALLY, CYNTHIA GONZALEZ INDIVIDUALLY, LAURA GATICA INDIVIDUALLY ROBERTO GONZALEZ ANCIRA INDIVIDUALLY & AS REPRESENTATIVE OF ESTATE OF ROBERTO GONZALEZ JR., PLAINTIFFS

VS.

JIT TRANSPORT LLC., ASHIRWAD GROUP LLC, GERMAN RIOS JR. INDIVIDUALLY, & CARLOS SANCHEZ INDIVIDUALLY, & D/B/A C & G TRUCKING, RAUL RAMIREZ, & WEEKS MARINE, INC., DEFENDANTS

Said Plaintiff's Petition was filed on 01/31/2020 in said court by:

JON B. ELLIS, ATTORNEY FOR PLAINTIFF
8620 N. NEW BRAUNFELS AVE. SUITE 110
SAN ANTONIO TX 78217

WITNESS ESTHER DEGOLLADO, DISTRICT CLERK OF WEBB COUNTY, TEXAS, Issued and given under my hand and seal of said court at office, on this the 5th day of February, 2020.

C L E R K O F C O U R T

ESTHER DEGOLLADO
WEBB COUNTY DISTRICT CLERK
P.O. BOX 667
LAREDO, TX 78042

BY:

Serenidad Diaz

DEPUTY



2020CVF000220D3

OFFICER'S RETURN

Came to hand on the _____ day of _____, 2020 at
 _____ O'CLOCK M. Executed at
 _____, within the COUNTY of _____
 at _____ O'CLOCK M. on the _____ day of _____, 2020, by delivering to the within named **JIT
TRANSPORT LLC BY SERVING ITS REGISTERED AGENT SHETUL B.
MUCHHALA**, each, in person, a true copy of this citation together
 with the accompanying copy of the petition, having first
 attached such copy of such petition to such copy of citation and
 endorsed on such copy of citation the date of delivery.

The distance actually travelled by me in serving such process
 was _____ miles, and my fees are as follows:

Total Fee for serving this citation \$ _____.

To certify which, witness my hand officially.

SHERIFF, CONSTABLE

COUNTY, TEXAS

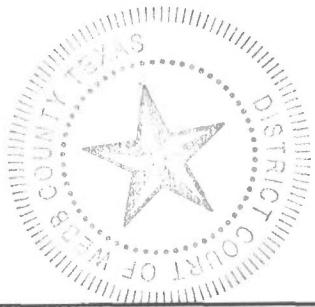
BY _____ DEPUTY

THE STATE OF TEXAS }
 COUNTY OF WEBB }

Before me, the undersigned authority, on this day personally
 appeared _____, who after being duly
 sworn, upon oath said that a notice, of which the above is a
 true copy, was by him/her delivered to

_____ on the
 day of _____, _____.

SWORN TO AND SUBSCRIBED BEFORE ME on the _____ day of
 _____, _____, to certify which witness my hand and
 seal of office.



A True copy of the original. I certify
 the 10th day of March 2020
ESTHER DEGOLLADO
 Clerk of the District Courts and
 County Court at Law Webb County, Texas
 By: Esther Degollado Deputy

NOTARY PUBLIC
 MY COMMISSION EXPIRES _____

RETURN
2020CVF000220D3

CITATION

PLAINTIFFS' ORIGINAL PETITION, REQUEST FOR DISCLOSURE, LOURDES RODRIGUEZ DE GONZALEZ'S FIRST SET OF INTERROGATORIES TO DEFENDANTS & LOURDES RODRIGUEZ DE GONZALEZ'S FIRST REQUEST FOR PRODUCTION TO DEFENDANTS

THE STATE OF TEXAS
COUNTY OF WEBB

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04/15/2020 AT 1:30PM

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TO: JIT TRANSPORT LLC
BY SERVING ITS REGISTERED AGENT SHETUL B. MUCHHALA
101 WEST DEL MAR SUITE 5E
LAREDO TX 78041

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PLAINTIFFS

VS.

JIT TRANSPORT LLC., ASHIRWAD GROUP LLC, GERMAN RIOS JR. INDIVIDUALLY, & CARLOS SANCHEZ INDIVIDUALLY, & D/B/A C & G TRUCKING, RAUL RAMIREZ, & WEEKS MARINE, INC., DEFENDANTS

Said Plaintiff's Petition was filed on 01/31/2020 in said court by:

JON B. ELLIS, ATTORNEY FOR PLAINTIFF
8620 N. NEW BRAUNFELS AVE. SUITE 110
SAN ANTONIO TX 78217

WITNESS ESTHER DEGOLLADO, DISTRICT CLERK OF WEBB COUNTY, TEXAS, Issued and given under my hand and seal of said court at office, on this the 5th day of February, 2020.

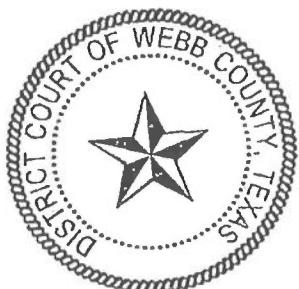
C L E R K O F C O U R T

ESTHER DEGOLLADO
WEBB COUNTY DISTRICT CLERK
P.O. BOX 667
LAREDO, TX 78042

BY:

Serenidad Diaz

DEPUTY



2020CVF000220D3

OFFICER'S RETURN

Came to hand on the _____ day of _____, 2020 at
_____ O'CLOCK _____.M. Executed at
_____, within the COUNTY of _____
at _____ O'CLOCK _____.M. on the _____ day of _____
_____, 2020, by delivering to the within named **JIT
TRANSPORT LLC BY SERVING ITS REGISTERED AGENT SHETUL B.
MUCHHALA**, each, in person, a true copy of this citation together
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The distance actually travelled by me in serving such process
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Total Fee for serving this citation \$ _____.

To certify which, witness my hand officially.

SHERIFF, CONSTABLE

_____ COUNTY, TEXAS

BY _____ DEPUTY

THE STATE OF TEXAS }
COUNTY OF WEBB }

Before me, the undersigned authority, on this day personally
appeared _____, who after being duly
sworn, upon oath said that a notice, of which the above is a
true copy, was by him/her delivered to

_____ on the
day of _____, _____.

SWORN TO AND SUBSCRIBED BEFORE ME on the _____ day of
_____, _____, to certify which witness my hand and
seal of office.

NOTARY PUBLIC
MY COMMISSION EXPIRES

SERVE
2020CVF000220D3

CITATION

PLAINTIFFS' ORIGINAL PETITION, REQUEST FOR DISCLOSURE, LOURDES RODRIGUEZ DE GONZALEZ'S FIRST SET OF INTERROGATORIES TO DEFENDANTS & LOURDES RODRIGUEZ DE GONZALEZ'S FIRST REQUEST FOR PRODUCTION TO DEFENDANTS

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TO: ASHIRWAD GROUP LLC
BY SERVING ITS REGISTERED AGENT SHETUL B. MUCHHALA
101 WEST DEL MAR SUITE 5E
LAREDO TX 78041

DEFENDANT, IN THE HEREINAFTER STYLED AND NUMBERED CAUSE, YOU ARE HEREBY COMMANDED TO APPEAR BEFORE THE 341st District Court of Webb County, Texas, to be held at the said courthouse of said county in the city of Laredo, Webb County, Texas, by filing a written answer to the Petition of Plaintiff at or before 10:00 O'CLOCK A.M. of the Monday next after the expiration of 20 days after the date of service thereof, a copy of which accompanies this citation, in the Cause #: 2020CVF000220D3, styled:

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PLAINTIFFS

VS.

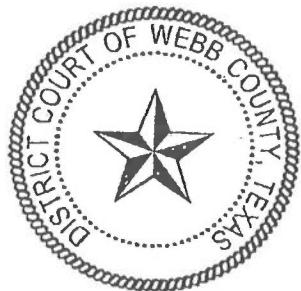
JIT TRANSPORT LLC., ASHIRWAD GROUP LLC, GERMAN RIOS JR. INDIVIDUALLY, & CARLOS SANCHEZ INDIVIDUALLY, & D/B/A C & G TRUCKING, RAUL RAMIREZ, & WEEKS MARINE, INC., DEFENDANTS

Said Plaintiff's Petition was filed on 01/31/2020 in said court by:

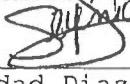
JON B. ELLIS, ATTORNEY FOR PLAINTIFF
8620 N. NEW BRAUNFELS AVE. SUITE 110
SAN ANTONIO TX 78217

WITNESS ESTHER DEGOLLADO, DISTRICT CLERK OF WEBB COUNTY, TEXAS, Issued and given under my hand and seal of said court at office, on this the 5th day of February, 2020.

C L E R K O F C O U R T



ESTHER DEGOLLADO
WEBB COUNTY DISTRICT CLERK
P.O. BOX 667
LAREDO, TX 78042

BY:  DEPUTY
Serenidad Diaz

2020CVF000220D3

OFFICER'S RETURN

Came to hand on the _____ day of _____, 2020 at
 _____ O'CLOCK _____.M. Executed at
 _____, within the COUNTY of _____
 at _____ O'CLOCK _____.M. on the _____ day of _____, 2020, by delivering to the within named
ASHIRWAD GROUP LLC BY SERVING ITS REGISTERED AGENT SHETUL B. MUCHHALA, each, in person, a true copy of this citation together with the accompanying copy of the petition, having first attached such copy of such petition to such copy of citation and endorsed on such copy of citation the date of delivery.

The distance actually travelled by me in serving such process was _____ miles, and my fees are as follows:

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SHERIFF, CONSTABLE

COUNTY, TEXAS

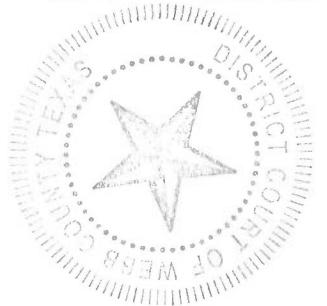
BY _____
DEPUTY

THE STATE OF TEXAS }
COUNTY OF WEBB }

Before me, the undersigned authority, on this day personally appeared _____, who after being duly sworn, upon oath said that a notice, of which the above is a true copy, was by him/her delivered to

_____ on the _____
day of _____, _____.

SWORN TO AND SUBSCRIBED BEFORE ME on the _____ day of _____, _____, to certify which witness my hand and seal of office.



A True copy of the original. I certify
 the 6th day of March 2020 NOTARY PUBLIC
 ESTHER DEGOLLADO MY COMMISSION EXPIRES
 Clerk of the District Courts and
 County Court at Law Webb County, Texas
 By: J. DeGollado Deputy

RETURN
2020CVF000220D3

CITATION

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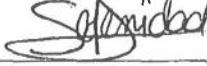
JON B. ELLIS, ATTORNEY FOR PLAINTIFF
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SAN ANTONIO TX 78217

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C L E R K O F C O U R T

ESTHER DEGOLLADO
WEBB COUNTY DISTRICT CLERK
P.O. BOX 667
LAREDO, TX 78042

BY:


Serenidad Diaz

DEPUTY



2020CVF000220D3

OFFICER'S RETURN

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at _____ O'CLOCK _____.M. on the _____ day of
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MUCHHALA**, each, in person, a true copy of this citation together
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SHERIFF, CONSTABLE

_____ COUNTY, TEXAS

BY _____ DEPUTY

THE STATE OF TEXAS }
COUNTY OF WEBB }

Before me, the undersigned authority, on this day personally
appeared _____, who after being duly
sworn, upon oath said that a notice, of which the above is a
true copy, was by him/her delivered to

_____ on the
_____ day of _____, _____.

SWORN TO AND SUBSCRIBED BEFORE ME on the _____ day of
_____, _____, to certify which witness my hand and
seal of office.

NOTARY PUBLIC
MY COMMISSION EXPIRES

SERVE
2020CVF000220D3

CITATION

PLAINTIFFS' ORIGINAL PETITION, REQUEST FOR DISCLOSURE, LOURDES RODRIGUEZ DE GONZALEZ'S FIRST SET OF INTERROGATORIES TO DEFENDANTS & LOURDES RODRIGUEZ DE GONZALEZ'S FIRST REQUEST FOR PRODUCTION TO DEFENDANTS

THE STATE OF TEXAS
COUNTY OF WEBB

CALENDAR CALL HEARING SET FOR
04/15/2020 AT 1:30PM

NOTICE TO THE DEFENDANT: "YOU HAVE BEEN SUED. YOU MAY EMPLOY AN ATTORNEY. IF YOU OR YOUR ATTORNEY DO NOT FILE A WRITTEN ANSWER WITH THE CLERK WHO ISSUED THIS CITATION BY 10:00 A.M. ON THE MONDAY NEXT FOLLOWING THE EXPIRATION OF TWENTY DAYS AFTER YOU WERE SERVED THIS CITATION AND PETITION, A DEFAULT JUDGMENT MAY BE TAKEN AGAINST YOU."

TO: GERMAN RIOS JR
1717 B CORTEZ
LAREDO TX 78043

OR WHEREVER HE MAY BE FOUND
VIA PRIVATE PROCESS.

DEFENDANT, IN THE HEREINAFTER STYLED AND NUMBERED CAUSE, YOU ARE HEREBY COMMANDED TO APPEAR BEFORE THE 341st District Court of Webb County, Texas, to be held at the said courthouse of said county in the city of Laredo, Webb County, Texas, by filing a written answer to the Petition of Plaintiff at or before 10:00 O'CLOCK A.M. of the Monday next after the expiration of 20 days after the date of service thereof, a copy of which accompanies this citation, in the Cause #: 2020CVF000220D3, styled:

MA LOURDES GONZALEZ INDIVIUALLY, LOURDES RODRIGUEZ DE GONZALEZ INDIVIDUALLY, LESLYLE GONZALEZ INDIVIDUALLY, CYNTHIA GONZALEZ INDIVIDUALLY, LAURA GATICA INDIVIDUALLY ROBERTO GONZALEZ ANCIRA INDIVIDUALLY & AS REPRESENTATIVE OF ESTATE OF ROBERTO GONZALEZ JR.,

PLAINTIFFS

VS.

JIT TRANSPORT LLC., ASHIRWAD GROUP LLC, GERMAN RIOS JR. INDIVIDUALLY, & CARLOS SANCHEZ INDIVIDUALLY, & D/B/A C & G TRUCKING, RAUL RAMIREZ, & WEEKS MARINE, INC., DEFENDANTS

Said Plaintiff's Petition was filed on 01/31/2020 in said court by:

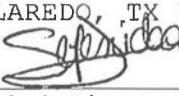
JON B. ELLIS, ATTORNEY FOR PLAINTIFF
8620 N. NEW BRAUNFELS AVE. SUITE 110
SAN ANTONIO TX 78217

WITNESS ESTHER DEGOLLADO, DISTRICT CLERK OF WEBB COUNTY, TEXAS, Issued and given under my hand and seal of said court at office, on this the 5th day of February, 2020.

C L E R K O F C O U R T



ESTHER DEGOLLADO
WEBB COUNTY DISTRICT CLERK
P.O. BOX 667
LAREDO, TX 78042

BY:  DEPUTY
Serenidad Diaz

2020CVF000220D3

OFFICER'S RETURN

Came to hand on the _____ day of _____, 2020 at _____ O'CLOCK .M. Executed at _____, within the COUNTY of _____, at _____ O'CLOCK .M. on the _____ day of _____, 2020, by delivering to the within named **GERMAN RIOS JR**, each, in person, a true copy of this citation together with the accompanying copy of the petition, having first attached such copy of such petition to such copy of citation and endorsed on such copy of citation the date of delivery.

The distance actually travelled by me in serving such process was _____ miles, and my fees are as follows:

Total Fee for serving this citation \$ _____.

To certify which, witness my hand officially.

SHERIFF, CONSTABLE

_____ COUNTY, TEXAS

BY _____ DEPUTY

THE STATE OF TEXAS }
COUNTY OF WEBB }

Before me, the undersigned authority, on this day personally appeared _____, who after being duly sworn, upon oath said that a notice, of which the above is a true copy, was by him/her delivered to

on the

_____ day of _____, _____.

SWORN TO AND SUBSCRIBED BEFORE ME on the _____ day of _____, _____, to certify which witness my hand and seal of office.

A True copy of the original I certify
 the 6th day of March 2020
 ESTHER DEGOLLADO
 Clerk of the District Courts and
 County Court at Law Webb County, Texas
 By: Esther Degollado

NOTARY PUBLIC
 MY COMMISSION EXPIRES _____



RETURN
2020CVF000220D3

CITATION

PLAINTIFFS' ORIGINAL PETITION, REQUEST FOR DISCLOSURE, LOURDES RODRIGUEZ DE GONZALEZ'S FIRST SET OF INTERROGATORIES TO DEFENDANTS & LOURDES RODRIGUEZ DE GONZALEZ'S FIRST REQUEST FOR PRODUCTION TO DEFENDANTS

THE STATE OF TEXAS
COUNTY OF WEBB

CALENDAR CALL HEARING SET FOR
04/15/2020 AT 1:30PM

NOTICE TO THE DEFENDANT: "YOU HAVE BEEN SUED. YOU MAY EMPLOY AN ATTORNEY. IF YOU OR YOUR ATTORNEY DO NOT FILE A WRITTEN ANSWER WITH THE CLERK WHO ISSUED THIS CITATION BY 10:00 A.M. ON THE MONDAY NEXT FOLLOWING THE EXPIRATION OF TWENTY DAYS AFTER YOU WERE SERVED THIS CITATION AND PETITION, A DEFAULT JUDGMENT MAY BE TAKEN AGAINST YOU."

TO: GERMAN RIOS JR
1717 B CORTEZ
LAREDO TX 78043
OR WHEREVER HE MAY BE FOUND
VIA PRIVATE PROCESS.

DEFENDANT, IN THE HEREINAFTER STYLED AND NUMBERED CAUSE, YOU ARE HEREBY COMMANDED TO APPEAR BEFORE THE 341st District Court of Webb County, Texas, to be held at the said courthouse of said county in the city of Laredo, Webb County, Texas, by filing a written answer to the Petition of Plaintiff at or before 10:00 O'CLOCK A.M. of the Monday next after the expiration of 20 days after the date of service thereof, a copy of which accompanies this citation, in the Cause #: 2020CVF000220D3, styled:

MA LOURDES GONZALEZ INDIVIUALLY, LOURDES RODRIGUEZ DE GONZALEZ INDIVIUDALLY, LESLYLE GONZALEZ INDIVIDUALLY, CYNTHIA GONZALEZ INDIVIDUALLY, LAURA GATICA INDIVIDUALLY ROBERTO GONZALEZ ANCIRA INDIVIDUALLY & AS REPRESENTATIVE OF ESTATE OF ROBERTO GONZALEZ JR.,

PLAINTIFFS

VS.

JIT TRANSPORT LLC., ASHIRWAD GROUP LLC, GERMAN RIOS JR. INDIVIDUALLY, & CARLOS SANCHEZ INDIVIDUALLY, & D/B/A C & G TRUCKING, RAUL RAMIREZ, & WEEKS MARINE, INC., DEFENDANTS

Said Plaintiff's Petition was filed on 01/31/2020 in said court by:

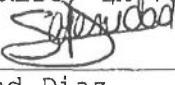
JON B. ELLIS, ATTORNEY FOR PLAINTIFF
8620 N. NEW BRAUNFELS AVE. SUITE 110
SAN ANTONIO TX 78217

WITNESS ESTHER DEGOLLADO, DISTRICT CLERK OF WEBB COUNTY, TEXAS, Issued and given under my hand and seal of said court at office, on this the 5th day of February, 2020.

C L E R K O F C O U R T

ESTHER DEGOLLADO
WEBB COUNTY DISTRICT CLERK
P.O. BOX 667
LAREDO, TX 78042

BY:


Serenidad Diaz

DEPUTY



2020CVF000220D3

OFFICER'S RETURN

Came to hand on the _____ day of _____, 2020 at
_____ O'CLOCK _____.M. Executed at
_____, within the COUNTY of _____
at _____ O'CLOCK _____.M. on the _____ day of _____
_____, 2020, by delivering to the within named **GERMAN**
RIOS JR, each, in person, a true copy of this citation together
with the accompanying copy of the petition, having first
attached such copy of such petition to such copy of citation and
endorsed on such copy of citation the date of delivery.

The distance actually travelled by me in serving such process
was _____ miles, and my fees are as follows:

Total Fee for serving this citation \$ _____.

To certify which, witness my hand officially.

SHERIFF, CONSTABLE

_____ COUNTY, TEXAS

BY _____ DEPUTY

THE STATE OF TEXAS }
COUNTY OF WEBB }

Before me, the undersigned authority, on this day personally
appeared _____, who after being duly
sworn, upon oath said that a notice, of which the above is a
true copy, was by him/her delivered to

_____ on the
_____ day of _____, _____.

SWORN TO AND SUBSCRIBED BEFORE ME on the _____ day of
_____, _____, to certify which witness my hand and
seal of office.

_____ NOTARY PUBLIC
MY COMMISSION EXPIRES

SERVE
2020CVF000220D3

CITATION

PLAINTIFFS' ORIGINAL PETITION, REQUEST FOR DISCLOSURE, LOURDES RODRIGUEZ DE GONZALEZ'S FIRST SET OF INTERROGATORIES TO DEFENDANTS & LOURDES RODRIGUEZ DE GONZALEZ'S FIRST REQUEST FOR PRODUCTION TO DEFENDANTS

THE STATE OF TEXAS
COUNTY OF WEBB

CALENDAR CALL HEARING SET FOR
04/15/2020 AT 1:30PM

NOTICE TO THE DEFENDANT: "YOU HAVE BEEN SUED. YOU MAY EMPLOY AN ATTORNEY. IF YOU OR YOUR ATTORNEY DO NOT FILE A WRITTEN ANSWER WITH THE CLERK WHO ISSUED THIS CITATION BY 10:00 A.M. ON THE MONDAY NEXT FOLLOWING THE EXPIRATION OF TWENTY DAYS AFTER YOU WERE SERVED THIS CITATION AND PETITION, A DEFAULT JUDGMENT MAY BE TAKEN AGAINST YOU."

TO: CARLOS SANCHEZ
4019 SANTA CLEOTILDE OR WHEREVER HE MAY BE FOUND
LAREDO TX 78041 VIA PRIVATE PROCESS.

DEFENDANT, IN THE HEREINAFTER STYLED AND NUMBERED CAUSE, YOU ARE HEREBY COMMANDED TO APPEAR BEFORE THE 341st District Court of Webb County, Texas, to be held at the said courthouse of said county in the city of Laredo, Webb County, Texas, by filing a written answer to the Petition of Plaintiff at or before 10:00 O'CLOCK A.M. of the Monday next after the expiration of 20 days after the date of service thereof, a copy of which accompanies this citation, in the Cause #: 2020CVF000220D3, styled:

MA LOURDES GONZALEZ INDIVIUALLY, LOURDES RODRIGUEZ DE GONZALEZ INDIVIUDALLY, LESLYLE GONZALEZ INDIVIDUALLY, CYNTHIA GONZALEZ INDIVIDUALLY, LAURA GATICA INDIVIDUALLY ROBERTO GONZALEZ ANCIRA INDIVIDUALLY & AS REPRESENTATIVE OF ESTATE OF ROBERTO GONZALEZ JR., PLAINTIFFS

VS.

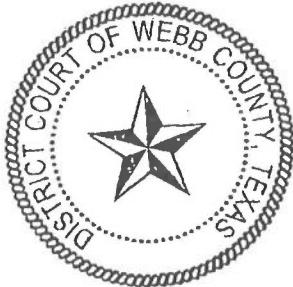
JIT TRANSPORT LLC., ASHIRWAD GROUP LLC, GERMAN RIOS JR. INDIVIDUALLY, & CARLOS SANCHEZ INDIVIDUALLY, & D/B/A C & G TRUCKING, RAUL RAMIREZ, & WEEKS MARINE, INC., DEFENDANTS

Said Plaintiff's Petition was filed on 01/31/2020 in said court by:

JON B. ELLIS, ATTORNEY FOR PLAINTIFF
8620 N. NEW BRAUNFELS AVE. SUITE 110
SAN ANTONIO TX 78217

WITNESS ESTHER DEGOLLADO, DISTRICT CLERK OF WEBB COUNTY, TEXAS, Issued and given under my hand and seal of said court at office, on this the 5th day of February, 2020.

C L E R K O F C O U R T



ESTHER DEGOLLADO
WEBB COUNTY DISTRICT CLERK
P.O. BOX 667
LAREDO, TX 78042

BY: Serenidad Diaz DEPUTY
Serenidad Diaz

2020CVF000220D3

OFFICER'S RETURN

Came to hand on the _____ day of _____, 2020 at
 _____ O'CLOCK _____ M. Executed at
 _____, within the COUNTY of _____
 at _____ O'CLOCK _____ M. on the _____ day of _____, 2020, by delivering to the within named **CARLOS SANCHEZ**, each, in person, a true copy of this citation together with the accompanying copy of the petition, having first attached such copy of such petition to such copy of citation and endorsed on such copy of citation the date of delivery.

The distance actually travelled by me in serving such process was _____ miles, and my fees are as follows:

Total Fee for serving this citation \$ _____.

To certify which, witness my hand officially.

SHERIFF, CONSTABLE

_____, COUNTY, TEXAS

BY _____ DEPUTY

THE STATE OF TEXAS }
 COUNTY OF WEBB }

Before me, the undersigned authority, on this day personally appeared _____, who after being duly sworn, upon oath said that a notice, of which the above is a true copy, was by him/her delivered to

_____ on the _____ day of _____, _____.

SWORN TO AND SUBSCRIBED BEFORE ME on the _____ day of _____, _____, to certify which witness my hand and seal of office.



A True copy of the original I certify,
 the 10th day of March 20 20²⁰
 ESTHER DEGOLLADO
 Clerk of the District Courts and
 County Court at Law Webb County, Texas
 By: Jewell Deputy

NOTARY PUBLIC
 MY COMMISSION EXPIRES _____

RETURN
2020CVF000220D3

CITATION

PLAINTIFFS' ORIGINAL PETITION, REQUEST FOR DISCLOSURE, LOURDES RODRIGUEZ DE GONZALEZ'S FIRST SET OF INTERROGATORIES TO DEFENDANTS & LOURDES RODRIGUEZ DE GONZALEZ'S FIRST REQUEST FOR PRODUCTION TO DEFENDANTS

THE STATE OF TEXAS
COUNTY OF WEBB

CALENDAR CALL HEARING SET FOR
04/15/2020 AT 1:30PM

NOTICE TO THE DEFENDANT: "YOU HAVE BEEN SUED. YOU MAY EMPLOY AN ATTORNEY. IF YOU OR YOUR ATTORNEY DO NOT FILE A WRITTEN ANSWER WITH THE CLERK WHO ISSUED THIS CITATION BY 10:00 A.M. ON THE MONDAY NEXT FOLLOWING THE EXPIRATION OF TWENTY DAYS AFTER YOU WERE SERVED THIS CITATION AND PETITION, A DEFAULT JUDGMENT MAY BE TAKEN AGAINST YOU."

TO: CARLOS SANCHEZ
4019 SANTA CLEOTILDE OR WHEREVER HE MAY BE FOUND
LAREDO TX 78041 VIA PRIVATE PROCESS.

DEFENDANT, IN THE HEREINAFTER STYLED AND NUMBERED CAUSE, YOU ARE HEREBY COMMANDED TO APPEAR BEFORE THE 341st District Court of Webb County, Texas, to be held at the said courthouse of said county in the city of Laredo, Webb County, Texas, by filing a written answer to the Petition of Plaintiff at or before 10:00 O'CLOCK A.M. of the Monday next after the expiration of 20 days after the date of service thereof, a copy of which accompanies this citation, in the Cause #: 2020CVF000220D3, styled:

MA LOURDES GONZALEZ INDIVIULLY, LOURDES RODRIGUEZ DE GONZALEZ INDIVIUDALLY, LESLYLE GONZALEZ INDIVIDUALLY, CYNTHIA GONZALEZ INDIVIDUALLY, LAURA GATICA INDIVIDUALLY ROBERTO GONZALEZ ANCIRA INDIVIDUALLY & AS REPRESENTATIVE OF ESTATE OF ROBERTO GONZALEZ JR.,

PLAINTIFFS

VS.

JIT TRANSPORT LLC., ASHIRWAD GROUP LLC, GERMAN RIOS JR. INDIVIDUALLY, & CARLOS SANCHEZ INDIVIDUALLY, & D/B/A C & G TRUCKING, RAUL RAMIREZ, & WEEKS MARINE, INC., DEFENDANTS

Said Plaintiff's Petition was filed on 01/31/2020 in said court by:

JON B. ELLIS, ATTORNEY FOR PLAINTIFF
8620 N. NEW BRAUNFELS AVE. SUITE 110
SAN ANTONIO TX 78217

WITNESS ESTHER DEGOLLADO, DISTRICT CLERK OF WEBB COUNTY, TEXAS, issued and given under my hand and seal of said court at office, on this the 5th day of February, 2020.

C L E R K . O F C O U R T



ESTHER DEGOLLADO
WEBB COUNTY DISTRICT CLERK
P.O. BOX 667
LAREDO, TX 78042

BY:

Serenidad Diaz

DEPUTY

2020CVF000220D3

OFFICER'S RETURN

Came to hand on the _____ day of _____, 2020 at
_____ O'CLOCK _____ M. Executed at
_____, within the COUNTY of _____
at _____ O'CLOCK _____ M. on the _____ day of _____
_____, 2020, by delivering to the within named **CARLOS**
SANCHEZ, each, in person, a true copy of this citation together
with the accompanying copy of the petition, having first
attached such copy of such petition to such copy of citation and
endorsed on such copy of citation the date of delivery.

The distance actually travelled by me in serving such process
was _____ miles, and my fees are as follows:

Total Fee for serving this citation \$ _____.

To certify which, witness my hand officially.

SHERIFF, CONSTABLE

COUNTY, TEXAS

BY _____

DEPUTY

THE STATE OF TEXAS }
COUNTY OF WEBB }

Before me, the undersigned authority, on this day personally
appeared _____, who after being duly
sworn, upon oath said that a notice, of which the above is a
true copy, was by him/her delivered to

on the

day of _____.

SWORN TO AND SUBSCRIBED BEFORE ME on the _____ day of
_____, to certify which witness my hand and
seal of office.

NOTARY PUBLIC
MY COMMISSION EXPIRES

SERVE
2020CVF000220D3

CITATION

PLAINTIFFS' ORIGINAL PETITION, REQUEST FOR DISCLOSURE, LOURDES RODRIGUEZ DE GONZALEZ'S FIRST SET OF INTERROGATORIES TO DEFENDANTS & LOURDES RODRIGUEZ DE GONZALEZ'S FIRST REQUEST FOR PRODUCTION TO DEFENDANTS

THE STATE OF TEXAS
COUNTY OF WEBB

CALENDAR CALL HEARING SET FOR
04/15/2020 AT 1:30PM

NOTICE TO THE DEFENDANT: "YOU HAVE BEEN SUED. YOU MAY EMPLOY AN ATTORNEY. IF YOU OR YOUR ATTORNEY DO NOT FILE A WRITTEN ANSWER WITH THE CLERK WHO ISSUED THIS CITATION BY 10:00 A.M. ON THE MONDAY NEXT FOLLOWING THE EXPIRATION OF TWENTY DAYS AFTER YOU WERE SERVED THIS CITATION AND PETITION, A DEFAULT JUDGMENT MAY BE TAKEN AGAINST YOU."

TO: GERMAN RIOS JR. & CARLOS SANCHEZ COLLECTIVELY D/B/A C & G TRUCKING
BY SERVING THE GENERAL PARTNERS
GERMAN RIOS JR.
1717 B CORTEZ
LAREDO TX 78043

DEFENDANT, IN THE HEREINAFTER STYLED AND NUMBERED CAUSE, YOU ARE HEREBY COMMANDED TO APPEAR BEFORE THE 341st District Court of Webb County, Texas, to be held at the said courthouse of said county in the city of Laredo, Webb County, Texas, by filing a written answer to the Petition of Plaintiff at or before 10:00 O'CLOCK A.M. of the Monday next after the expiration of 20 days after the date of service thereof, a copy of which accompanies this citation, in the Cause #: 2020CVF000220D3, styled:

MA LOURDES GONZALEZ INDIVIULLY, LOURDES RODRIGUEZ DE GONZALEZ INDIVIUDALLY, LESLYLE GONZALEZ INDIVIDUALLY, CYNTHIA GONZALEZ INDIVIDUALLY, LAURA GATICA INDIVIDUALLY ROBERTO GONZALEZ ANCIRA INDIVIDUALLY & AS REPRESENTATIVE OF ESTATE OF ROBERTO GONZALEZ JR.,

PLAINTIFFS

VS.

JIT TRANSPORT LLC., ASHIRWAD GROUP LLC, GERMAN RIOS JR. INDIVIDUALLY, & CARLOS SANCHEZ INDIVIDUALLY, & D/B/A C & G TRUCKING, RAUL RAMIREZ, & WEEKS MARINE, INC., DEFENDANTS

Said Plaintiff's Petition was filed on 01/31/2020 in said court by:

JON B. ELLIS, ATTORNEY FOR PLAINTIFF
8620 N. NEW BRAUNFELS AVE. SUITE 110
SAN ANTONIO TX 78217

WITNESS ESTHER DEGOLLADO, DISTRICT CLERK OF WEBB COUNTY, TEXAS, Issued and given under my hand and seal of said court at office, on this the 5th day of February, 2020.

C L E R K O F C O U R T

ESTHER DEGOLLADO
WEBB COUNTY DISTRICT CLERK
P.O. BOX 667
LAREDO, TX 78042

BY:


Serenidad Diaz

DEPUTY



2020CVF000220D3

OFFICER'S RETURN

Came to hand on the _____ day of _____, 2020 at
 _____ O'CLOCK M. Executed at
 _____, within the COUNTY of _____
 at _____ O'CLOCK M. on the _____ day of _____, 2020, by delivering to the within named GERMAN
**RIOS JR. & CARLOS SANCHEZ COLLECTIVELY D/B/A C & G TRUCKING BY SERVING THE
 GENERAL PARTNERS GERMAN RIOS JR., each, in person, a true copy of
 this citation together with the accompanying copy of the
 petition, having first attached such copy of such petition to
 such copy of citation and endorsed on such copy of citation the
 date of delivery.**

The distance actually travelled by me in serving such process
 was _____ miles, and my fees are as follows:

Total Fee for serving this citation \$ _____.

To certify which, witness my hand officially.

SHERIFF, CONSTABLE

COUNTY, TEXAS

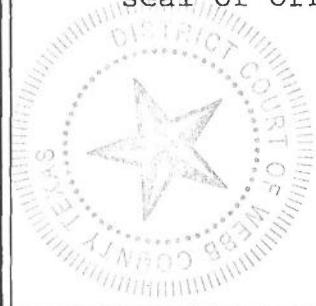
BY _____ DEPUTY

THE STATE OF TEXAS }
 COUNTY OF WEBB }

Before me, the undersigned authority, on this day personally
 appeared _____, who after being duly
 sworn, upon oath said that a notice, of which the above is a
 true copy, was by him/her delivered to

on the _____
 day of _____, _____.

SWORN TO AND SUBSCRIBED BEFORE ME on the _____ day of
 _____, _____, to certify which witness my hand and
 seal of office.



A True copy of the original. I certify
 the 6th day of March 2020
 ESTHER DEGOLLADO
 Clerk of the District Courts and
 County Court at Law Webb County, Texas
 By Esther Degollado Deputy

NOTARY PUBLIC
 MY COMMISSION EXPIRES _____

RETURN
2020CVF000220D3

CITATION

PLAINTIFFS' ORIGINAL PETITION, REQUEST FOR DISCLOSURE, LOURDES RODRIGUEZ DE GONZALEZ'S FIRST SET OF INTERROGATORIES TO DEFENDANTS & LOURDES RODRIGUEZ DE GONZALEZ'S FIRST REQUEST FOR PRODUCTION TO DEFENDANTS

THE STATE OF TEXAS
COUNTY OF WEBB

CALENDAR CALL HEARING SET FOR
04/15/2020 AT 1:30PM

NOTICE TO THE DEFENDANT: "YOU HAVE BEEN SUED. YOU MAY EMPLOY AN ATTORNEY. IF YOU OR YOUR ATTORNEY DO NOT FILE A WRITTEN ANSWER WITH THE CLERK WHO ISSUED THIS CITATION BY 10:00 A.M. ON THE MONDAY NEXT FOLLOWING THE EXPIRATION OF TWENTY DAYS AFTER YOU WERE SERVED THIS CITATION AND PETITION, A DEFAULT JUDGMENT MAY BE TAKEN AGAINST YOU."

TO: GERMAN RIOS JR. & CARLOS SANCHEZ COLLECTIVELY D/B/A C & G TRUCKING
BY SERVING THE GENERAL PARTNERS
GERMAN RIOS JR.
1717 B CORTEZ
LAREDO TX 78043

DEFENDANT, IN THE HEREINAFTER STYLED AND NUMBERED CAUSE, YOU ARE HEREBY COMMANDED TO APPEAR BEFORE THE 341st District Court of Webb County, Texas, to be held at the said courthouse of said county in the city of Laredo, Webb County, Texas, by filing a written answer to the Petition of Plaintiff at or before 10:00 O'CLOCK A.M. of the Monday next after the expiration of 20 days after the date of service thereof, a copy of which accompanies this citation, in the Cause #: 2020CVF000220D3, styled:

MA LOURDES GONZALEZ INDIVIUALLY, LOURDES RODRIGUEZ DE GONZALEZ INDIVIUDALLY, LESLYLE GONZALEZ INDIVIDUALLY, CYNTHIA GONZALEZ INDIVIDUALLY, LAURA GATICA INDIVIDUALLY ROBERTO GONZALEZ ANCIRA INDIVIDUALLY & AS REPRESENTATIVE OF ESTATE OF ROBERTO GONZALEZ JR.,
PLAINTIFFS

VS.

JIT TRANSPORT LLC., ASHIRWAD GROUP LLC, GERMAN RIOS JR. INDIVIDUALLY, & CARLOS SANCHEZ INDIVIDUALLY, & D/B/A C & G TRUCKING, RAUL RAMIREZ, & WEEKS MARINE, INC., DEFENDANTS

Said Plaintiff's Petition was filed on 01/31/2020 in said court by:

JON B. ELLIS, ATTORNEY FOR PLAINTIFF
8620 N. NEW BRAUNFELS AVE. SUITE 110
SAN ANTONIO TX 78217

WITNESS ESTHER DEGOLLADO, DISTRICT CLERK OF WEBB COUNTY, TEXAS, Issued and given under my hand and seal of said court at office, on this the 5th day of February, 2020.

C L E R K O F C O U R T



ESTHER DEGOLLADO
WEBB COUNTY DISTRICT CLERK
P.O. BOX 667
LAREDO, TX 78042

BY:

S. Diaz
Serenidad Diaz

DEPUTY

2020CVF000220D3

OFFICER'S RETURN

Came to hand on the _____ day of _____, 2020 at
_____ O'CLOCK _____.M. Executed at
_____, within the COUNTY of _____
at _____ O'CLOCK _____.M. on the _____ day of
_____, 2020, by delivering to the within named GERMAN
RIOS JR. & CARLOS SANCHEZ COLLECTIVELY D/B/A C & G TRUCKING BY SERVING THE
GENERAL PARTNERS GERMAN RIOS JR., each, in person, a true copy of
this citation together with the accompanying copy of the
petition, having first attached such copy of such petition to
such copy of citation and endorsed on such copy of citation the
date of delivery.

The distance actually travelled by me in serving such process
was _____ miles, and my fees are as follows:

Total Fee for serving this citation \$ _____.

To certify which, witness my hand officially.

SHERIFF, CONSTABLE

COUNTY, TEXAS

BY _____
DEPUTY

THE STATE OF TEXAS }
COUNTY OF WEBB }

Before me, the undersigned authority, on this day personally
appeared _____, who after being duly
sworn, upon oath said that a notice, of which the above is a
true copy, was by him/her delivered to

_____ on the
_____ day of _____, _____.

SWORN TO AND SUBSCRIBED BEFORE ME on the _____ day of
_____, _____, to certify which witness my hand and
seal of office.

NOTARY PUBLIC
MY COMMISSION EXPIRES

SERVE
2020CVF000220D3

CITATION

PLAINTIFFS' ORIGINAL PETITION, REQUEST FOR DISCLOSURE, LOURDES RODRIGUEZ DE GONZALEZ'S FIRST SET OF INTERROGATORIES TO DEFENDANTS & LOURDES RODRIGUEZ DE GONZALEZ'S FIRST REQUEST FOR PRODUCTION TO DEFENDANTS

THE STATE OF TEXAS
COUNTY OF WEBB

CALENDAR CALL HEARING SET FOR
04/15/2020 AT 1:30PM

NOTICE TO THE DEFENDANT: "YOU HAVE BEEN SUED. YOU MAY EMPLOY AN ATTORNEY. IF YOU OR YOUR ATTORNEY DO NOT FILE A WRITTEN ANSWER WITH THE CLERK WHO ISSUED THIS CITATION BY 10:00 A.M. ON THE MONDAY NEXT FOLLOWING THE EXPIRATION OF TWENTY DAYS AFTER YOU WERE SERVED THIS CITATION AND PETITION, A DEFAULT JUDGMENT MAY BE TAKEN AGAINST YOU."

TO: WEEKS MARINE, INC.
BY SERVING ITS REGISTERED AGENT THOMAS P BOYNTON
11011 RICHMOND AVENUE, SUITE 650
HOUSTON TX 77042

DEFENDANT, IN THE HEREINAFTER STYLED AND NUMBERED CAUSE, YOU ARE HEREBY COMMANDED TO APPEAR BEFORE THE 341st District Court of Webb County, Texas, to be held at the said courthouse of said county in the city of Laredo, Webb County, Texas, by filing a written answer to the Petition of Plaintiff at or before 10:00 O'CLOCK A.M. of the Monday next after the expiration of 20 days after the date of service thereof, a copy of which accompanies this citation, in the Cause #: 2020CVF000220D3, styled:

MA LOURDES GONZALEZ INDIVIUALLY, LOURDES RODRIGUEZ DE GONZALEZ INDIVIUDALLY, LESLYLE GONZALEZ INDIVIDUALLY, CYNTHIA GONZALEZ INDIVIDUALLY, LAURA GATICA INDIVIDUALLY ROBERTO GONZALEZ ANCIRA INDIVIDUALLY & AS REPRESENTATIVE OF ESTATE OF ROBERTO GONZALEZ JR.,
PLAINTIFFS

VS.

JIT TRANSPORT LLC., ASHIRWAD GROUP LLC, GERMAN RIOS JR. INDIVIDUALLY, & CARLOS SANCHEZ INDIVIDUALLY, & D/B/A C & G TRUCKING, RAUL RAMIREZ, & WEEKS MARINE, INC., DEFENDANTS

Said Plaintiff's Petition was filed on 01/31/2020 in said court by:
JON B. ELLIS, ATTORNEY FOR PLAINTIFF
8620 N. NEW BRAUNFELS AVE. SUITE 110
SAN ANTONIO TX 78217

WITNESS ESTHER DEGOLLADO, DISTRICT CLERK OF WEBB COUNTY, TEXAS, Issued and given under my hand and seal of said court at office, on this the 5th day of February, 2020.

C L E R K O F C O U R T



ESTHER DEGOLLADO
WEBB COUNTY DISTRICT CLERK
P.O. BOX 667
LAREDO, TX 78042

BY:

Serenidad Diaz

DEPUTY

2020CVF000220D3

OFFICER'S RETURN

Came to hand on the _____ day of _____, 2020 at
_____ O'CLOCK _____.M. Executed at
_____, within the COUNTY of _____
at _____ O'CLOCK _____.M. on the _____ day of
_____, 2020, by delivering to the within named WEEKS
MARINE, INC. BY SERVING ITS REGISTERED AGENT THOMAS P BOYNTON, each,
in person, a true copy of this citation together with the
accompanying copy of the petition, having first attached such
copy of such petition to such copy of citation and endorsed on
such copy of citation the date of delivery.

The distance actually travelled by me in serving such process
was _____ miles, and my fees are as follows:

Total Fee for serving this citation \$ _____.

To certify which, witness my hand officially.

SHERIFF, CONSTABLE

_____ COUNTY, TEXAS

BY _____ DEPUTY

THE STATE OF TEXAS }
COUNTY OF WEBB }

Before me, the undersigned authority, on this day personally
appeared _____, who after being duly
sworn, upon oath said that a notice, of which the above is a
true copy, was by him/her delivered to

_____ on the
day of _____, _____.

SWORN TO AND SUBSCRIBED BEFORE ME on the _____ day of
_____, _____, to certify which witness my hand and
seal of office.

A True copy of the original. I certify,
the 6th day of March 2020
ESTHER DEGOLLADO
Clerk of the District Courts and
County Court at Law Webb County, Texas
By: Esther D. Degollado Deputy

NOTARY PUBLIC
MY COMMISSION EXPIRES _____



RETURN
2020CVF000220D3

CITATION

PLAINTIFFS' ORIGINAL PETITION, REQUEST FOR DISCLOSURE, LOURDES RODRIGUEZ DE GONZALEZ'S FIRST SET OF INTERROGATORIES TO DEFENDANTS & LOURDES RODRIGUEZ DE GONZALEZ'S FIRST REQUEST FOR PRODUCTION TO DEFENDANTS

THE STATE OF TEXAS
COUNTY OF WEBB

CALENDAR CALL HEARING SET FOR
04/15/2020 AT 1:30PM

NOTICE TO THE DEFENDANT: "YOU HAVE BEEN SUED. YOU MAY EMPLOY AN ATTORNEY. IF YOU OR YOUR ATTORNEY DO NOT FILE A WRITTEN ANSWER WITH THE CLERK WHO ISSUED THIS CITATION BY 10:00 A.M. ON THE MONDAY NEXT FOLLOWING THE EXPIRATION OF TWENTY DAYS AFTER YOU WERE SERVED THIS CITATION AND PETITION, A DEFAULT JUDGMENT MAY BE TAKEN AGAINST YOU."

TO: WEEKS MARINE, INC.
BY SERVING ITS REGISTERED AGENT THOMAS P BOYNTON
11011 RICHMOND AVENUE, SUITE 650
HOUSTON TX 77042

DEFENDANT, IN THE HEREINAFTER STYLED AND NUMBERED CAUSE, YOU ARE HEREBY COMMANDED TO APPEAR BEFORE THE 341st District Court of Webb County, Texas, to be held at the said courthouse of said county in the city of Laredo, Webb County, Texas, by filing a written answer to the Petition of Plaintiff at or before 10:00 O'CLOCK A.M. of the Monday next after the expiration of 20 days after the date of service thereof, a copy of which accompanies this citation, in the Cause #: 2020CVF000220D3, styled:

MA LOURDES GONZALEZ INDIVIUALLY, LOURDES RODRIGUEZ DE GONZALEZ INDIVIDUALLY, LESLYLE GONZALEZ INDIVIDUALLY, CYNTHIA GONZALEZ INDIVIDUALLY, LAURA GATICA INDIVIDUALLY ROBERTO GONZALEZ ANCIRA INDIVIDUALLY & AS REPRESENTATIVE OF ESTATE OF ROBERTO GONZALEZ JR.,
PLAINTIFFS

VS.

JIT TRANSPORT LLC., ASHIRWAD GROUP LLC, GERMAN RIOS JR. INDIVIDUALLY, & CARLOS SANCHEZ INDIVIDUALLY, & D/B/A C & G TRUCKING, RAUL RAMIREZ, & WEEKS MARINE, INC., DEFENDANTS

Said Plaintiff's Petition was filed on 01/31/2020 in said court by:
JON B. ELLIS, ATTORNEY FOR PLAINTIFF
8620 N. NEW BRAUNFELS AVE. SUITE 110
SAN ANTONIO TX 78217

WITNESS ESTHER DEGOLLADO, DISTRICT CLERK OF WEBB COUNTY, TEXAS, Issued and given under my hand and seal of said court at office, on this the 5th day of February, 2020.

C L E R K O F C O U R T



ESTHER DEGOLLADO
WEBB COUNTY DISTRICT CLERK
P.O. BOX 667
LAREDO, TX 78042

BY: _____ DEPUTY
Serenidad Diaz

2020CVF000220D3

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at _____ O'CLOCK _____.M. on the _____ day of _____
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SHERIFF, CONSTABLE

_____ COUNTY, TEXAS

BY _____ DEPUTY

THE STATE OF TEXAS }
COUNTY OF WEBB }

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sworn, upon oath said that a notice, of which the above is a
true copy, was by him/her delivered to

_____ on the
_____ day of _____, _____.

SWORN TO AND SUBSCRIBED BEFORE ME on the _____ day of
_____, _____, to certify which witness my hand and
seal of office.

_____ NOTARY PUBLIC
MY COMMISSION EXPIRES

SERVE
2020CVF000220D3

CITATION

PLAINTIFFS' ORIGINAL PETITION, REQUEST FOR DISCLOSURE, LOURDES RODRIGUEZ DE GONZALEZ'S FIRST SET OF INTERROGATORIES TO DEFENDANTS & LOURDES RODRIGUEZ DE GONZALEZ'S FIRST REQUEST FOR PRODUCTION TO DEFENDANTS

THE STATE OF TEXAS
COUNTY OF WEBB

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TO: RAUL RAMIREZ
36215 COUNTY LINE ROAD OR WHEREVER HE MAY BE FOUND
BROOKSHIRE TX 77423 VIA PRIVATE PROCESS.

DEFENDANT, IN THE HEREINAFTER STYLED AND NUMBERED CAUSE, YOU ARE HEREBY COMMANDED TO APPEAR BEFORE THE 341st District Court of Webb County, Texas, to be held at the said courthouse of said county in the city of Laredo, Webb County, Texas, by filing a written answer to the Petition of Plaintiff at or before 10:00 O'CLOCK A.M. of the Monday next after the expiration of 20 days after the date of service thereof, a copy of which accompanies this citation, in the Cause #: 2020CVF000220D3, styled:

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VS.

JIT TRANSPORT LLC., ASHIRWAD GROUP LLC, GERMAN RIOS JR. INDIVIDUALLY, & CARLOS SANCHEZ INDIVIDUALLY, & D/B/A C & G TRUCKING, RAUL RAMIREZ, & WEEKS MARINE, INC., DEFENDANTS

Said Plaintiff's Petition was filed on 01/31/2020 in said court by:

JON B. ELLIS, ATTORNEY FOR PLAINTIFF
8620 N. NEW BRAUNFELS AVE. SUITE 110
SAN ANTONIO TX 78217

WITNESS ESTHER DEGOLLADO, DISTRICT CLERK OF WEBB COUNTY, TEXAS, Issued and given under my hand and seal of said court at office, on this the 5th day of February, 2020.

C L E R K O F C O U R T



ESTHER DEGOLLADO
WEBB COUNTY DISTRICT CLERK
P.O. BOX 667
LAREDO, TX 78042

BY:


Serenidad Diaz

DEPUTY

2020CVF000220D3

OFFICER'S RETURN

Came to hand on the _____ day of _____, 2020 at
 _____ O'CLOCK _____ M. Executed at
 _____, within the COUNTY of _____
 at _____ O'CLOCK _____.M. on the _____ day of
 _____, 2020, by delivering to the within named **RAUL**
RAMIREZ, each, in person, a true copy of this citation together
 with the accompanying copy of the petition, having first
 attached such copy of such petition to such copy of citation and
 endorsed on such copy of citation the date of delivery.

The distance actually travelled by me in serving such process
 was _____ miles, and my fees are as follows:

Total Fee for serving this citation \$ _____.

To certify which, witness my hand officially.

SHERIFF, CONSTABLE

_____ COUNTY, TEXAS

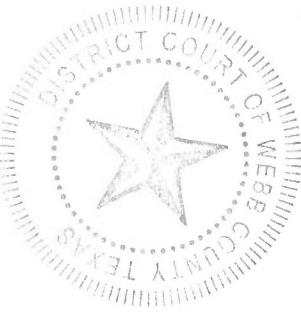
BY _____ DEPUTY

THE STATE OF TEXAS }
 COUNTY OF WEBB }

Before me, the undersigned authority, on this day personally
 appeared _____, who after being duly
 sworn, upon oath said that a notice, of which the above is a
 true copy, was by him/her delivered to

_____ on the
 _____ day of _____, _____.

SWORN TO AND SUBSCRIBED BEFORE ME on the _____ day of
 _____, _____, to certify which witness my hand and
 seal of office.



A True copy of the original I certify
 the 10th day of March 20 20²³
 ESTHER DEGOLLADO
 Clerk of the District Courts and
 County Court at Law Webb County, Texas
 By: J. DeGollado Deputy

NOTARY PUBLIC
 MY COMMISSION EXPIRES _____

RETURN
2020CVF000220D3

CITATION

PLAINTIFFS' ORIGINAL PETITION, REQUEST FOR DISCLOSURE, LOURDES RODRIGUEZ DE GONZALEZ'S FIRST SET OF INTERROGATORIES TO DEFENDANTS & LOURDES RODRIGUEZ DE GONZALEZ'S FIRST REQUEST FOR PRODUCTION TO DEFENDANTS

THE STATE OF TEXAS
COUNTY OF WEBB

CALENDAR CALL HEARING SET FOR
04/15/2020 AT 1:30PM

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MA LOURDES GONZALEZ INDIVIULLY, LOURDES RODRIGUEZ DE GONZALEZ INDIVIDUALLY, LESLYLE GONZALEZ INDIVIDUALLY, CYNTHIA GONZALEZ INDIVIDUALLY, LAURA GATICA INDIVIDUALLY ROBERTO GONZALEZ ANCIRA INDIVIDUALLY & AS REPRESENTATIVE OF ESTATE OF ROBERTO GONZALEZ JR.,

PLAINTIFFS

VS.

JIT TRANSPORT LLC., ASHIRWAD GROUP LLC, GERMAN RIOS JR. INDIVIDUALLY, & CARLOS SANCHEZ INDIVIDUALLY, & D/B/A C & G TRUCKING, RAUL RAMIREZ, & WEEKS MARINE, INC., DEFENDANTS

Said Plaintiff's Petition was filed on 01/31/2020 in said court by:

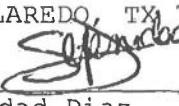
JON B. ELLIS, ATTORNEY FOR PLAINTIFF
8620 N. NEW BRAUNFELS AVE. SUITE 110
SAN ANTONIO TX 78217

WITNESS ESTHER DEGOLLADO, DISTRICT CLERK OF WEBB COUNTY, TEXAS, Issued and given under my hand and seal of said court at office, on this the 5th day of February, 2020.

C L E R K O F C O U R T



ESTHER DEGOLLADO
WEBB COUNTY DISTRICT CLERK
P.O. BOX 667
LAREDO, TX 78042

BY:  DEPUTY
Serenidad Diaz

2020CVF000220D3

OFFICER'S RETURN

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_____ O'CLOCK _____.M. Executed at
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at _____ O'CLOCK _____.M. on the _____ day of _____
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To certify which, witness my hand officially.

SHERIFF, CONSTABLE

COUNTY, TEXAS

BY _____
DEPUTY

THE STATE OF TEXAS }
COUNTY OF WEBB }

Before me, the undersigned authority, on this day personally
appeared _____, who after being duly
sworn, upon oath said that a notice, of which the above is a
true copy, was by him/her delivered to

on the

day of _____, _____.

SWORN TO AND SUBSCRIBED BEFORE ME on the _____ day of
_____, _____, to certify which witness my hand and
seal of office.

NOTARY PUBLIC
MY COMMISSION EXPIRES

Filed
2/18/2020 12:00 AM
Esther Degollado
District Clerk
Webb District
Frida Garcia
RETURN
2020CVF000220D3
2020CVF000220D3

CITATION

PLAINTIFFS' ORIGINAL PETITION, REQUEST FOR DISCLOSURE, LOURDES RODRIGUEZ DE GONZALEZ'S FIRST SET OF INTERROGATORIES TO DEFENDANTS & LOURDES RODRIGUEZ DE GONZALEZ'S FIRST REQUEST FOR PRODUCTION TO DEFENDANTS

THE STATE OF TEXAS
COUNTY OF WEBB

CALENDAR CALL HEARING SET FOR
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TO: WEEKS MARINE, INC.
BY SERVING ITS REGISTERED AGENT THOMAS P BOYNTON
11011 RICHMOND AVENUE, SUITE 650
HOUSTON TX 77042

DEFENDANT, IN THE HEREINAFTER STYLED AND NUMBERED CAUSE, YOU ARE HEREBY COMMANDED TO APPEAR BEFORE THE 341st District Court of Webb County, Texas, to be held at the said courthouse of said county in the city of Laredo, Webb County, Texas, by filing a written answer to the Petition of Plaintiff at or before 10:00 O'CLOCK A.M. of the Monday next after the expiration of 20 days after the date of service thereof, a copy of which accompanies this citation, in the Cause #: 2020CVF000220D3, styled:

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PLAINTIFFS

VS.

JIT TRANSPORT LLC., ASHIRWAD GROUP LLC, GERMAN RIOS JR. INDIVIDUALLY, & CARLOS SANCHEZ INDIVIDUALLY, & D/B/A C & G TRUCKING, RAUL RAMIREZ, & WEEKS MARINE, INC., DEFENDANTS

Said Plaintiff's Petition was filed on 01/31/2020 in said court by:
JON B. ELLIS, ATTORNEY FOR PLAINTIFF
8620 N. NEW BRAUNFELS AVE. SUITE 110
SAN ANTONIO TX 78217

WITNESS ESTHER DEGOLLADO, DISTRICT CLERK OF WEBB COUNTY, TEXAS, Issued and given under my hand and seal of said court at office, on this the 5th day of February, 2020.

C L E R K O F C O U R T



ESTHER DEGOLLADO
WEBB COUNTY DISTRICT CLERK
P.O. BOX 667
LAREDO, TX 78042

BY:

Serenidad Diaz

DEPUTY

2020CVF000220D3

OFFICER'S RETURN

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_____ O'CLOCK _____.M. Executed at
_____, within the COUNTY of _____
at _____ O'CLOCK _____.M. on the _____ day of
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MARINE, INC. BY SERVING ITS REGISTERED AGENT THOMAS P BOYNTON, each,
in person, a true copy of this citation together with the
accompanying copy of the petition, having first attached such
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SHERIFF, CONSTABLE

_____ COUNTY, TEXAS

BY _____ DEPUTY

THE STATE OF TEXAS }
COUNTY OF WEBB }

Before me, the undersigned authority
appeared _____
sworn, upon oath said that
true copy, was by him

day

s day personally
after being duly
the above is a

on the

SWORN TO AND SUBSCRIBED

seal of office.

See Attached
Affidavit

ME on the _____ day of
_____, to certify which witness my hand and

NOTARY PUBLIC
MY COMMISSION EXPIRES

CAUSE NO. 2020CVF000220D3

MA LOURDES GONZALEZ, ET AL § IN THE DISTRICT COURT
Plaintiffs, §
§
v. § 341st JUDICIAL DISTRICT
§
JIT TRANSPORT LLC, ET AL §
Defendants. § WEBB COUNTY, TEXAS

AFFIDAVIT OF PERSONAL SERVICE

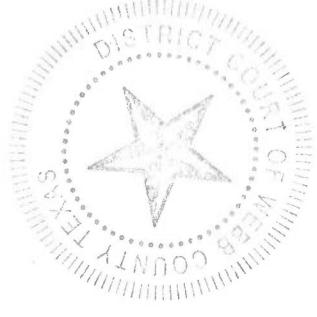
Aaron Woodward appeared in person before me today and stated under oath:

"My name is Aaron Woodward. I am over the age of eighteen years, and I am fully competent to make this affidavit.

"The following came to hand on February 7, 2020 at 1839 hours.

"On February 13, 2020 at 1050 hours, I personally delivered the following listed documents to Weeks Marine, Inc., by serving its registered agent Thomas P. Boynton, at 11011 Richmond Avenue, Suite 650, Houston, Texas 77042, via U.S. certified mail restricted delivery, return receipt requested, tracking no. 70142870000223770305:

- 1) Citation;
- 2) Plaintiffs' Original Petition, Requests for Disclosure, Lourdes Rodriguez De Gonzalez's First Set of Interrogatories to Defendants & Lourdes Rodriguez De Gonzalez's First Request for Production to Defendants;
- 3) Plaintiff Lourdes Rodriguez De Gonzalez First Requests for Production to Defendants LJIT Transport LLC, Ashirwad Group LLC, German Rios Jr., Carlos Sanchez, C & G Trucking, Raul Ramirez, and Weeks Marine Inc;
- 4) Decedent Roberto Gonzalez Jr Lourdes Rodriguez De Gonzalez First Requests for Production to Defendants JIT Transport LLC, Ashirwad Group LLC, German Rios Jr., Carlos Sanchez, C & G Trucking, Raul Ramirez, and Weeks Marine Inc.; and
- 5) Plaintiff Lourdes Rodriguez De Gonzalez First Set of Interrogatories to Defendant Weeks Marine Inc.



A True copy of the original. I certify
the 6th day of March 2020
ESTHER DEGOLLADO
Clerk of the District Courts and
County Court at Law Webb County, Texas
By: J. Kevin Deputy

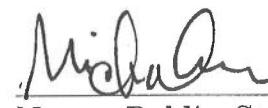
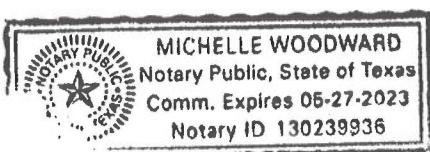
I am a person over eighteen (18) years of age and I am competent to make this affidavit. I am a resident of the State of Texas. I am familiar with the Tex. R. Civ. P. as they apply to service of process. I am not a party to this suit nor related or affiliated with any parties herein and have no interest in the outcome of this suit. I have never been convicted of a felony or of a misdemeanor involving moral turpitude. I have personal knowledge of the facts stated herein and they are true and correct."



Aaron Woodward

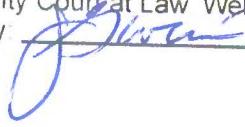
10397 - 6/30/21
SCH No. / Exp Date

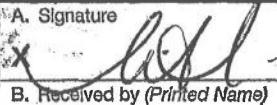
SIGNED under oath before me on this 17th day of February 2020.



Michelle
Notary Public, State of Texas



A True copy of the original. I certify
the 6th day of March 20 2020
ESTHER DEGOLLADO
Clerk of the District Courts and
County Court at Law Webb County, Texas
By:  Deputy

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Complete Items 1, 2, and 3. <input checked="" type="checkbox"/> Print your name and address on the reverse so that we can return the card to you. <input checked="" type="checkbox"/> Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Signature </p> <p><input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) _____</p> <p>C. Date of Delivery _____</p>	
<p>1. Article Addressed to:</p> <p>WEEKS MARINE, INC. C/O: THOMAS P BOYNTON 11011 RICHMOND AVENUE, SUITE 650 HOUSTON, TEXAS 77042</p> <p>9590 9402 3168 7166 3359 79</p> <p>2. Article Number (<i>Transfer from service label</i>) 7014287000223770305</p>		<p>D. Is delivery address different from Item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No.</p> <p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail® <input checked="" type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p> <p><input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery</p>	
<p>PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt</p>			

2/18/2020 12:00 AM

Esther Degollado

RETURN District Clerk

Webb District

Frida Garcia

2020CVF000220D3

2020CVF000220D3

CITATION

PLAINTIFFS' ORIGINAL PETITION, REQUEST FOR DISCLOSURE, LOURDES RODRIGUEZ DE GONZALEZ'S FIRST SET OF INTERROGATORIES TO DEFENDANTS & LOURDES RODRIGUEZ DE GONZALEZ'S FIRST REQUEST FOR PRODUCTION TO DEFENDANTS

THE STATE OF TEXAS
COUNTY OF WEBB

CALENDAR CALL HEARING SET FOR
04/15/2020 AT 1:30PM

NOTICE TO THE DEFENDANT: "YOU HAVE BEEN SUED. YOU MAY EMPLOY AN ATTORNEY. IF YOU OR YOUR ATTORNEY DO NOT FILE A WRITTEN ANSWER WITH THE CLERK WHO ISSUED THIS CITATION BY 10:00 A.M. ON THE MONDAY NEXT FOLLOWING THE EXPIRATION OF TWENTY DAYS AFTER YOU WERE SERVED THIS CITATION AND PETITION, A DEFAULT JUDGMENT MAY BE TAKEN AGAINST YOU."

TO: RAUL RAMIREZ
36215 COUNTY LINE ROAD OR WHEREVER HE MAY BE FOUND
BROOKSHIRE TX 77423 VIA PRIVATE PROCESS.

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PLAINTIFFS

VS.

JIT TRANSPORT LLC., ASHIRWAD GROUP LLC, GERMAN RIOS JR. INDIVIDUALLY, & CARLOS SANCHEZ INDIVIDUALLY, & D/B/A C & G TRUCKING, RAUL RAMIREZ, & WEEKS MARINE, INC., DEFENDANTS

Said Plaintiff's Petition was filed on 01/31/2020 in said court by:

JON B. ELLIS, ATTORNEY FOR PLAINTIFF
8620 N. NEW BRAUNFELS AVE. SUITE 110
SAN ANTONIO TX 78217

WITNESS ESTHER DEGOLLADO, DISTRICT CLERK OF WEBB COUNTY, TEXAS, Issued and given under my hand and seal of said court at office, on this the 5th day of February, 2020.

C L E R K O F C O U R T



ESTHER DEGOLLADO
WEBB COUNTY DISTRICT CLERK
P.O. BOX 667
LAREDO, TX 78042

BY: _____

Serenidad Diaz

DEPUTY

2020CVF000220D3

OFFICER'S RETURN

Came to hand on the _____ day of _____, 2020 at
 _____ O'CLOCK _____.M. Executed at
 _____, within the COUNTY of _____
 at _____ O'CLOCK _____.M. on the _____ day of _____, 2020, by delivering to the within named **RAUL RAMIREZ**, each, in person, a true copy of this citation together with the accompanying copy of the petition, having first attached such copy of such petition to such copy of citation and endorsed on such copy of citation the date of delivery.

The distance actually travelled by me in serving such process was _____ miles, and my fees are as follows:

Total Fee for serving this citation \$ _____.

To certify which, witness my hand officially.

SHERIFF, CONSTABLE

_____ COUNTY, TEXAS

BY _____ DEPUTY

THE STATE OF TEXAS }
 COUNTY OF WEBB }

Before me, the undersigned appeared, sworn, upon oath, to me, to take a true copy,

*See Attached
Affidavit*

is day personally
 after being duly
 h the above is a
 on the _____, _____.

SWORN TO AND SIGNED before me on the _____ day of _____, to certify which witness my hand and seal of office.



A True copy of the original. I certify, NOTARY PUBLIC
 the 6th day of March, 20 20 MY COMMISSION EXPIRES

ESTHER DEGOLLADO

Clerk of the District Courts and
 County Court at Law Webb County, Texas
 By Esther Degollado Deputy

CAUSE NO. 2020CVF000220D3

MA LOURDES GONZALEZ INDIVIDUALLY, LOURDES
RODRIGUEZ DE GONZALEZ INDIVIDUALLY, LESLYLE
GONZALEZ INDIVIDUALLY, CYNTHIA GONZALEZ
INDIVIDUALLY, LAURA GATICA INDIVIDUALLY,
ROBERTO GONZALEZ ANCIRA INDIVIDUALLY & AS
REPRESENTATIVE OF ESTATE OF ROBERTO GONZALEZ
JR.

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Plaintiff,
VS.
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JIT TRANSPORT LLC, ASHIRWAD GROUP LLC, GERMAN RIOS JR. INDIVIDUALLY, & D/B/A C & G TRUCKING,
RAUL RAMIREZ, & WEEKS MARINE, INC.
Defendant.

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IN THE COURT OF

WEBB COUNTY,

341ST JUDICIAL DISTRICT

AFFIDAVIT OF SERVICE

On this day personally appeared John L. Preston, Sr. who, being by me duly sworn, deposed and said:

"The following came to hand on Feb 12, 2020, 4:06 pm,

CITATION, PLAINTIFF'S ORIGINAL PETITION, REQUEST FOR DISCLOSURE, LOURDES RODRIGUEZ DE GONZALEZ'S FIRST SET OF INTERROGATORIES TO DEFENDANTS & LOURDES RODRIGUEZ DE GONZALEZ'S FIRST REQUEST FOR PRODUCTION TO DEFENDANTS,

and was executed at 36215 County Line Rd, Brookshire, TX 77423 within the county of Waller at 05:49 PM on Wed, Feb 12 2020, by delivering a true copy to the within named

RAUL RAMIREZ

In person, having first endorsed the date of delivery on same.

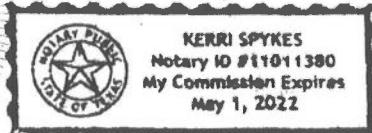
I am a person over eighteen (18) years of age and I am competent to make this affidavit. I am a resident of the State of Texas. I am familiar with the Texas Rules of Civil Procedure as they apply to service of Process. I am not a party to this suit nor related or affiliated with any herein, and have no interest in the outcome of the suit. I have never been convicted of a felony or of a misdemeanor involving moral turpitude. I have personal knowledge of the facts stated herein and they are true and correct."

John L. Preston, Sr.

John L. Preston, Sr.
Certification Number: #PSC0999
Certification Expiration: 08/30/2021

BEFORE ME, a Notary Public, on this day personally appeared John L. Preston, Sr., known to me to be the person whose name is subscribed to the foregoing document and, being by me first duly sworn, declared that the statements therein contained are within his or her personal knowledge and are true and correct.

SUBSCRIBED AND SWORN TO ME ON FEBRUARY 13, 2020



Kerris Spykes
Notary Public, State of Texas

A True copy of the original. I certify, the 6th day of March, 2020
ESTHER DEGOLLADO

Clerk of the District Courts and
County Court at Law Webb County, Texas
By: *J.L.P.* Deputy

RETURN
2020CVF000220D3

CITATION

PLAINTIFFS' ORIGINAL PETITION, REQUEST FOR DISCLOSURE, LOURDES RODRIGUEZ DE GONZALEZ'S FIRST SET OF INTERROGATORIES TO DEFENDANTS & LOURDES RODRIGUEZ DE GONZALEZ'S FIRST REQUEST FOR PRODUCTION TO DEFENDANTS

THE STATE OF TEXAS
COUNTY OF WEBB

CALENDAR CALL HEARING SET FOR
04/15/2020 AT 1:30PM

NOTICE TO THE DEFENDANT: "YOU HAVE BEEN SUED. YOU MAY EMPLOY AN ATTORNEY IF YOU OR YOUR ATTORNEY DO NOT FILE A WRITTEN ANSWER WITH THE CLERK WHO ISSUED THIS CITATION BY 10:00 A.M. ON THE MONDAY NEXT FOLLOWING THE EXPIRATION OF TWENTY DAYS AFTER YOU WERE SERVED THIS CITATION AND PETITION, A DEFAULT JUDGMENT MAY BE TAKEN AGAINST YOU."

TO: CARLOS SANCHEZ
4019 SANTA CLEOTILDE
LAREDO TX 78041 OR WHEREVER HE MAY BE FOUND
VIA PRIVATE PROCESS.

DEFENDANT, IN THE HEREINAFTER STYLED AND NUMBERED CAUSE, YOU ARE HEREBY COMMANDED TO APPEAR BEFORE THE 341st District Court of Webb County, Texas, to be held at the said courthouse of said county in the city of Laredo, Webb County, Texas, by filing a written answer to the Petition of Plaintiff at or before 10:00 O'CLOCK A.M. of the Monday next after the expiration of 20 days after the date of service thereof, a copy of which accompanies this citation, in the Cause #: 2020CVF000220D3, styled:

MA LOURDES GONZALEZ INDIVIULLY, LOURDES RODRIGUEZ DE GONZALEZ INDIVIUDALLY, LESLYLE GONZALEZ INDIVIDULLY, CYNTHIA GONZALEZ INDIVIDULLY, LAURA GATICA INDIVIDULLY ROBERTO GONZALEZ ANCIRA INDIVIDULLY & AS REPRESENTATIVE OF ESTATE OF ROBERTO GONZALEZ JR.,

PLAINTIFFS

VS.

JIT TRANSPORT LLC., ASHIRWAD GROUP LLC, GERMAN RIOS JR. INDIVIDULLY, & CARLOS SANCHEZ INDIVIDULLY, & D/B/A C & G TRUCKING, RAUL RAMIREZ, & WEEKS MARINE, INC., DEFENDANTS

Said Plaintiff's Petition was filed on 01/31/2020 in said court by:

JON B. ELLIS, ATTORNEY FOR PLAINTIFF
8620 N. NEW BRAUNFELS AVE. SUITE 110
SAN ANTONIO TX 78217

WITNESS ESTHER DEGOLLADO, DISTRICT CLERK OF WEBB COUNTY, TEXAS, Issued and given under my hand and seal of said court at office, on this the 5th day of February, 2020.

C L E R K C O F C O U R T



ESTHER DEGOLLADO
WEBB COUNTY DISTRICT CLERK
P.O. BOX 667
LAREDO, TX 78042

BY:

Serena Diaz

DEPUTY

+ Closed 6:25 pm

2020CVF000220D3

OFFICER'S RETURN

Came to hand on the _____ day of _____, 2020 at
_____ O'CLOCK M. Executed at
_____, within the COUNTY of _____
at _____ O'CLOCK M. on the _____ day of _____, 2020, by delivering to the within named **CARLOS SANCHEZ**, each, in person, a true copy of this citation together with the accompanying copy of the petition; having first attached such copy of such petition to such copy of citation and endorsed on such copy of citation the date of delivery.

The distance actually travelled by me in serving such process was _____ miles, and my fees are as follows:

Total Fee for serving this citation \$ _____.

To certify which, witness my hand officially.

SHERIFF, CONSTABLE

_____ COUNTY, TEXAS

BY _____ DEPUTY

THE STATE OF TEXAS }
COUNTY OF WEBB }

Before me, the undersigned authority, on this day personally appeared _____, who after being duly sworn, upon oath said that a notice, of which the above is a true copy, was by him/her delivered to

on the

_____ day of _____, _____.

SWORN TO AND SUBSCRIBED BEFORE ME on the _____ day of _____, _____, to certify which witness my hand and seal of office.

NOTARY PUBLIC
MY COMMISSION EXPIRES

PROCESS SERVER'S RETURN

CAUSE NO. 2020CVF000220D3

STATE OF TEXAS

COUNTY OF WEBB

AFFIDAVIT

BEFORE ME, a Notary Public in and for the State of Texas, came and appeared the undersigned, of legal age, who by me being first duly sworn, under oath hereby deposes and says,

"My name is GABRIEL A. HERNANDEZ. My place of business if 84 GROVELAREDO, TEXAS. I am duly authorized process server under Rule 103 of the Texas Rules of Civil Procedure." The foregoing instrument:

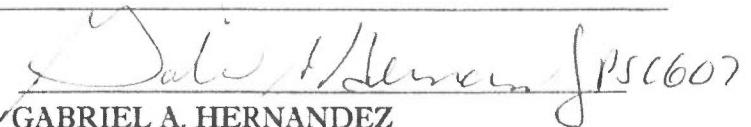
"CAME TO HAND on the 5 day of February 2020

"IT WAS EXECUTED at 4019 SANTA CLEOTIDE Laredo Tx 78041
Within the County of Webb at 6:25 o'Clock P.M. on the 15 day of
February, 2010 by delivering to the within named

CARLOS SANCHEZ

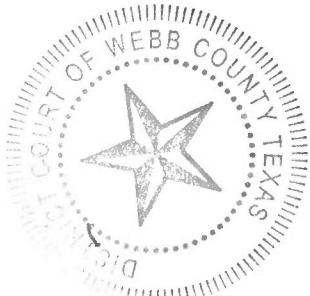
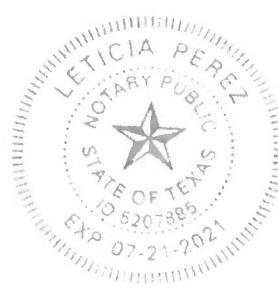
in person, a true copy of this CITATION PLAINTIFF ORIGNAL PETITION REQUEST FOR DISCLOSURE
TO DEFENDANT'S & LOUIZNE RODRIGUEZ CONCEPCION'S FIRST SET OF INTERROGATORIES
"IT WAS NOT EXECUTED upon FOR PRODUCTION TO DEFENDANT'S
diligence used to executed being _____
and for the following reason _____

Further Affiant Sayeth Not.


GABRIEL A. HERNANDEZ
SCH#0607 EXP DATE 09/30/21

SUBSCRIBED AND SWORN TO BEFORE ME, a Notary Public, on this 18th
of February 2020.


Notary Public in and for the
State of *TEXAS*



the 6th day of March 2020
ESTHER DEGOLLADO
Clerk of the District Courts and
County Court at Law Webb County, Texas
By  Deputy

RETURN
2020CVF000220D3

CITATION

PLAINTIFFS' ORIGINAL PETITION, REQUEST FOR DISCLOSURE, LOURDES RODRIGUEZ DE GONZALEZ'S FIRST SET OF INTERROGATORIES TO DEFENDANTS & LOURDES RODRIGUEZ DE GONZALEZ'S FIRST REQUEST FOR PRODUCTION TO DEFENDANTS

THE STATE OF TEXAS
COUNTY OF WEBB

CALENDAR CALL HEARING SET FOR
04/15/2020 AT 1:30PM

NOTICE TO THE DEFENDANT: "YOU HAVE BEEN SUED. YOU MAY EMPLOY AN ATTORNEY. IF YOU OR YOUR ATTORNEY DO NOT FILE A WRITTEN ANSWER WITH THE CLERK WHO ISSUED THIS CITATION BY 10:00 A.M. ON THE MONDAY NEXT FOLLOWING THE EXPIRATION OF TWENTY DAYS AFTER YOU WERE SERVED THIS CITATION AND PETITION, A DEFAULT JUDGMENT MAY BE TAKEN AGAINST YOU."

TO: GERMAN RIOS JR. & CARLOS SANCHEZ COLLECTIVELY D/B/A C & G TRUCKING
BY SERVING THE GENERAL PARTNERS
GERMAN RIOS JR.
1717 B CORTEZ
LAREDO TX 78043

DEFENDANT, IN THE HEREINAFTER STYLED AND NUMBERED CAUSE, YOU ARE HEREBY COMMANDED TO APPEAR BEFORE THE 341st District Court of Webb County, Texas, to be held at the said courthouse of said county in the city of Laredo, Webb County, Texas, by filing a written answer to the Petition of Plaintiff at or before 10:00 O'CLOCK A.M. of the Monday next after the expiration of 20 days after the date of service thereof, a copy of which accompanies this citation, in the Cause #: 2020CVF000220D3, styled:

MA LOURDES GONZALEZ INDIVIUALLY, LOURDES RODRIGUEZ DE GONZALEZ INDIVIUDALLY, LESLYLE GONZALEZ INDIVIDUALLY, CYNTHIA GONZALEZ INDIVIDUALLY, LAURA GATICA INDIVIDUALLY ROBERTO GONZALEZ ANCIRA INDIVIDUALLY & AS REPRESENTATIVE OF ESTATE OF ROBERTO GONZALEZ JR.,

PLAINTIFFS

VS.

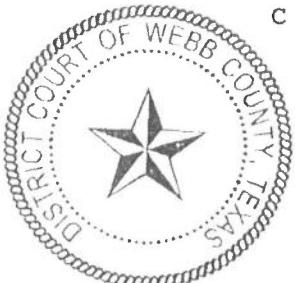
JIT TRANSPORT LLC., ASHIRWAD GROUP LLC, GERMAN RIOS JR. INDIVIDUALLY, & CARLOS SANCHEZ INDIVIDUALLY, & D/B/A C & G TRUCKING, RAUL RAMIREZ, & WEEKS MARINE, INC., DEFENDANTS

Said Plaintiff's Petition was filed on 01/31/2020 in said court by:

JON B. ELLIS, ATTORNEY FOR PLAINTIFF
8620 N. NEW BRAUNFELS AVE. SUITE 110
SAN ANTONIO TX 78217

WITNESS ESTHER DEGOLLADO, DISTRICT CLERK OF WEBB COUNTY, TEXAS, Issued and given under my hand and seal of said court at office, on this the 5th day of February, 2020.

C L E R K O F C O U R T



ESTHER DEGOLLADO
WEBB COUNTY DISTRICT CLERK
P.O. BOX 667
LAREDO, TX 78042

BY:

Serenidad Diaz

DEPUTY

AFFIDAVIT OF SERVICE

CAUSE NO. 2020CVFOOUZ20D3

STATE OF TEXAS

COUNTY OF WEBB

BEFORE ME, a Notary Public in and for the State of Texas, came and appeared the undersigned, of legal age, who by me being first duly sworn, under oath hereby deposes and says,

"My name is **GABRIEL A. HERNANDEZ**. My place of business if **84 GROVE LAREDO, TEXAS**. I am duly authorized process server under Rule 103 of the Texas Rules of Civil Procedure." This Affidavit if to certify the following:

"CAME TO HAND on the 5 day of February 2020

"I executed the foregoing Citation in naming GABRIEL RIOS JR & CARLOS SANCHEZ ^{GABRIEL RIOS JR} as defendant on the 5 day of February, 2020 by placing the Citation and a true copy of the pleading attached thereto in the United States Mail ,Via Certified Mail No# 7019 1640 0001 0310 0672 address 1717 B CORTEZ ST Laredo Texas 78041

"RETURN RECEIPT REQUESTED" and delivery to the addressee only, after having first endorsed on said citation the date of mailing and the name and address of the with-in named recipient, to certify which witness my hand this 14 day of February 2020

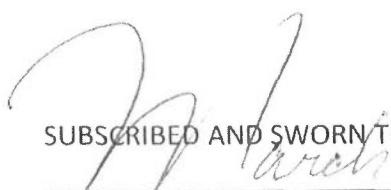
OR

"The forgoing Citation was not served upon _____

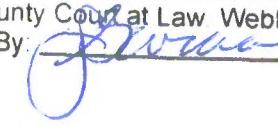
Due to the fact that: _____

Further Affiant Sayeth Not

 PSC607
GABRIEL A. HERNANDEZ PSC #607
EXP DATE 09/30/20


SUBSCRIBED AND SWORN TO BEFORE ME, a Notary Public, on this 2 of
March 2020.


Notary Public in and for the
State of *TEXAS*

A True copy of the original. I certify
the 6th day of March, 2020
ESTHER DEGOLLADO
Clerk of the District Courts and
County Court at Law Webb County, Texas
By:  Deputy



USPS Tracking®

[FAQs >](#)

[Track Another Package +](#)

Tracking Number: 70191640000103100672

[Remove X](#)

Your item was delivered to an individual at the address at 2:51 pm on February 14, 2020 in LAREDO, TX 78043.

[Feedback](#)

Delivered

February 14, 2020 at 2:51 pm
Delivered, Left with Individual
LAREDO, TX 78043

[Get Updates ▾](#)

[Text & Email Updates](#) ▾

[Tracking History](#) ▾

[Product Information](#) ▾

[See Less ^](#)

2020CVF000220D3

OFFICER'S RETURN

Came to hand on the _____ day of _____, 2020 at _____
 O'CLOCK _____ M. Executed at _____
 within the COUNTY of _____
 at _____ O'CLOCK _____ M. on the _____ day of _____
 , 2020, by delivering to the within named **GERMAN RIOS JR. & CARLOS SANCHEZ COLLECTIVELY D/B/A C & G TRUCKING BY SERVING THE GENERAL PARTNERS GERMAN RIOS JR.**, each, in person, a true copy of this citation together with the accompanying copy of the petition, having first attached such copy of such petition to such copy of citation and endorsed on such copy of citation the date of delivery.

The distance actually travelled by me in serving such process was _____ miles, and my fees are as follows:

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
**GERMAN RIOS Jr. & CARLOS SANCHEZ
 COLLECTIVELY D/B/A C & G TRUCKING
 BY SERVING THE GENERAL PARTNERS
 GERMAN RIOS JR.
 1717 B CORTEZ
 Laredo Texas 78043**



9590 9402 5596 9274 1904 98

2. Article Number (Transfer from service label)

2019 1640 0001 0310 0672

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

 Agent Addressee

B. Received by (Printed Name)

GRios

C. Date of Delivery

3/4/2020

CONSTABLE

D. Is delivery address different from item 1? YesIf YES, enter delivery address below: No

COUNTY, TEXAS

DEPUTY

3. Service Type

- Adult Signature
- Adult Signature Restricted Delivery
- Certified Mail®
- Certified Mail Restricted Delivery
- Collect on Delivery
- Collect on Delivery Restricted Delivery
- Insured Mail
- Insured Mail Restricted Delivery (over \$500)

- Priority Mail Express®
- Registered Mail™
- Registered Mail Restricted Delivery
- Return Receipt for Merchandise
- Signature Confirmation™
- Signature Confirmation Restricted Delivery

3 day personally after being duly

Domestic Return Receipt in the above is a

true copy was by him/her delivered to

U.S. Postal Service™

CERTIFIED MAIL® RECEIPT

Domestic Mail Only

For delivery information, visit our website at www.usps.com.

ORE ME on the _____ day of _____

to certify which witness my hand and

2019 1640 0001 0310 0672

Certified Mail Fee

\$ Extra Services & Fees (check box and type or initial) _____
 Return Receipt (Handcopy) \$ _____
 Return Receipt (e-electronic) \$ _____
 Certified Mail Restricted Delivery \$ _____
 Adult Signature Required \$ _____
 Adult Signature Restricted Delivery \$ _____

Postmark
Here

Postage

Total Postage and Fees

\$

Sent To
 German Rios Jr & Carlos Sanchez D/B/A C & G Trucking
 Street and Apt. No. or P.O. Box No.
 1717 B CORTEZ
 City, State, ZIP+4
 Laredo Texas 78043

NOTARY PUBLIC
 MY COMMISSION EXPIRES

RETURN
2020CVF000220D3

CITATION

PLAINTIFFS' ORIGINAL PETITION, REQUEST FOR DISCLOSURE, LOURDES RODRIGUEZ DE GONZALEZ'S FIRST SET OF INTERROGATORIES TO DEFENDANTS & LOURDES RODRIGUEZ DE GONZALEZ'S FIRST REQUEST FOR PRODUCTION TO DEFENDANTS

THE STATE OF TEXAS
COUNTY OF WEBB

CALENDAR CALL HEARING SET FOR
04/15/2020 AT 1:30PM

NOTICE TO THE DEFENDANT: "YOU HAVE BEEN SUED. YOU MAY EMPLOY AN ATTORNEY. IF YOU OR YOUR ATTORNEY DO NOT FILE A WRITTEN ANSWER WITH THE CLERK WHO ISSUED THIS CITATION BY 10:00 A.M. ON THE MONDAY NEXT FOLLOWING THE EXPIRATION OF TWENTY DAYS AFTER YOU WERE SERVED THIS CITATION AND PETITION, A DEFAULT JUDGMENT MAY BE TAKEN AGAINST YOU."

TO: GERMAN RIOS JR
1717 B CORTEZ
LAREDO TX 78043

OR WHEREVER HE MAY BE FOUND
VIA PRIVATE PROCESS.

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DEFENDANT, IN THE HEREINAFTER STYLED AND NUMBERED CAUSE, YOU ARE HEREBY COMMANDED TO APPEAR BEFORE THE 341st District Court of Webb County, Texas, to be held at the said courthouse of said county in the city of Laredo, Webb County, Texas, by filing a written answer to the Petition of Plaintiff at or before 10:00 O'CLOCK A.M. of the Monday next after the expiration of 20 days after the date of service thereof, a copy of which accompanies this citation, in the Cause #: 2020CVF000220D3, styled:

MA LOURDES GONZALEZ INDIVIUALLY, LOURDES RODRIGUEZ DE GONZALEZ INDIVIDUALLY, LESLYLE GONZALEZ INDIVIDUALLY, CYNTHIA GONZALEZ INDIVIDUALLY, LAURA GATICA INDIVIDUALLY ROBERTO GONZALEZ ANCIRA INDIVIDUALLY & AS REPRESENTATIVE OF ESTATE OF ROBERTO GONZALEZ JR.,

PLAINTIFFS

VS.

JIT TRANSPORT LLC., ASHIRWAD GROUP LLC, GERMAN RIOS JR. INDIVIDUALLY, & CARLOS SANCHEZ INDIVIDUALLY, & D/B/A C & G TRUCKING, RAUL RAMIREZ, & WEEKS MARINE, INC., DEFENDANTS

Said Plaintiff's Petition was filed on 01/31/2020 in said court by:

JON B. ELLIS, ATTORNEY FOR PLAINTIFF
8620 N. NEW BRAUNFELS AVE. SUITE 110
SAN ANTONIO TX 78217

WITNESS ESTHER DEGOLLADO, DISTRICT CLERK OF WEBB COUNTY, TEXAS, Issued and given under my hand and seal of said court at office, on this the 5th day of February, 2020.

C L E R K O F C O U R T

ESTHER DEGOLLADO
WEBB COUNTY DISTRICT CLERK
P.O. BOX 667
LAREDO, TX 78042

BY:

Serenidad Diaz

DEPUTY



X German Rios 3:15 PM 2-15-20

2020CVF000220D3

OFFICER'S RETURN

Came to hand on the _____ day of _____, 2020 at
_____ O'CLOCK .M. Executed at
_____, within the COUNTY of _____
at _____ O'CLOCK .M. on the _____ day of _____
_____, 2020, by delivering to the within named GERMAN
RIOS JR, each, in person, a true copy of this citation together
with the accompanying copy of the petition, having first
attached such copy of such petition to such copy of citation and
endorsed on such copy of citation the date of delivery.

The distance actually travelled by me in serving such process
was _____ miles, and my fees are as follows:

Total Fee for serving this citation \$ _____.

To certify which, witness my hand officially.

SHERIFF, CONSTABLE

COUNTY, TEXAS

BY _____
DEPUTY

THE STATE OF TEXAS }
COUNTY OF WEBB }

Before me, the undersigned authority, on this day personally
appeared _____, who after being duly
sworn, upon oath said that a notice, of which the above is a
true copy, was by him/her delivered to

_____ on the
_____ day of _____, _____.

SWORN TO AND SUBSCRIBED BEFORE ME on the _____ day of
_____, _____, to certify which witness my hand and
seal of office.

NOTARY PUBLIC
MY COMMISSION EXPIRES

PROCESS SERVER'S RETURN

CAUSE NO. 2020 CV F 000 220D3

STATE OF TEXAS

COUNTY OF WEBB

AFFIDAVIT

BEFORE ME, a Notary Public in and for the State of Texas, came and appeared the undersigned, of legal age, who by me being first duly sworn, under oath hereby deposes and says,

"My name is GABRIEL A. HERNANDEZ. My place of business if 84 GROVELAREDO, TEXAS. I am duly authorized process server under Rule 103 of the Texas Rules of Civil Procedure." The foregoing instrument:

"CAME TO HAND on the 5 day of February 2020

"IT WAS EXECUTED at 1717 B CORTEZ ST Laredo TX 78041
Within the County of Webb at 3:15 o'Clock P.M. on the 15 day of
February, 2020 by delivering to the within named

GERMAN RIOS JR

in person, a true copy of this CITATION AND PLAINTIFF'S ORIGINAL PETITION, REQUEST FOR DISCLOSURE, LOURDES RODRIGUEZ DE GONZALEZ'S FIRST SET OF INTERROGATORIES TO DEFENDANTS & LOURDES RODRIGUEZ DE GONZALEZ'S FIRST REQUEST FOR PRODUCTION TO DEFENDANTS

diligence used to executed being _____
and for the following reason _____

Further Affiant Sayeth Not.

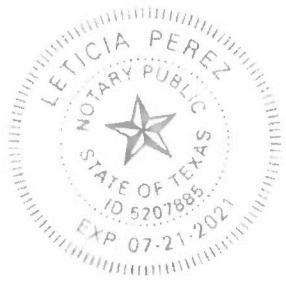
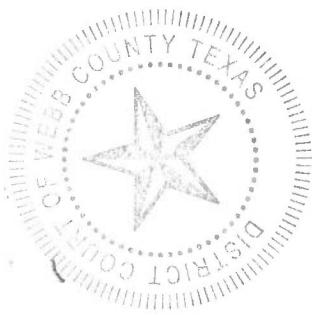
GABRIEL A. HERNANDEZ

SCH#0607 EXP DATE 09/30/21

SUBSCRIBED AND SWORN TO BEFORE ME, a Notary Public, on this 18th
of February 2020

Notary Public in and for the
State of *TEXAS*

A True copy of the original. I certify,
the 10th day of March, 2020
ESTHER DEGOLLADO
Clerk of the District Courts and
County Court at Law, Webb County, Texas
By: Esther Degollado Deputy



ATTACHMENT 2

[Skip to Main Content](#) [Logout](#) [My Account](#) [Search](#) [Menu](#) [New Civil Search](#) [Refine Search](#) [Back](#)
Location : All Courts [Help](#)

REGISTER OF ACTIONS

CASE NO. 2020CVF000220D3

MA LOURDES GONZALEZ,LOURDES RODRIGUEZ DE
 GONZALEZ,LESLYLE GONZALEZ,CYNTHIA GONZALEZ,LAURA
 GATICA,ROBERTO GONZALEZ ANCIRA VS. JIT TRANSPORT
 LLC,ASHIRWAD GROUP LLC,GERMAN RIOS JR.,CARLOS
 SANCHEZ,GERMAN RIOS JR. & CARLOS SANCHEZ,RAUL
 RAMIREZ,WEEKS MARINE INC.

§
§
§
§
§

Case Type: Injury or Damage - Other Injury or Damage (DC)
 Subtype: Other Injury or Damage (DC)
 Date Filed: 01/31/2020
 Location: --341st District Court

PARTY INFORMATION

		Attorneys
Defendant	ASHIRWAD GROUP LLC	
Defendant	GERMAN RIOS JR. & CARLOS SANCHEZ	
Defendant	JIT TRANSPORT LLC	
Defendant	RAMIREZ, RAUL	
Defendant	RIOS JR., GERMAN	
Defendant	SANCHEZ, CARLOS	
Defendant	WEEKS MARINE INC.	
Plaintiff	GATICA, LAURA	JON B. ELLIS <i>Retained</i> 2108329090 x2108024131(W)
Plaintiff	GONZALEZ ANCIRA, ROBERTO	JON B. ELLIS <i>Retained</i> 2108329090 x2108024131(W)
Plaintiff	GONZALEZ, CYNTHIA	JON B. ELLIS <i>Retained</i> 2108329090 x2108024131(W)
Plaintiff	GONZALEZ, LESLYLE	JON B. ELLIS <i>Retained</i> 2108329090 x2108024131(W)
Plaintiff	GONZALEZ, MA LOURDES	JON B. ELLIS <i>Retained</i> 2108329090 x2108024131(W)
Plaintiff	RODRIGUEZ DE GONZALEZ, LOURDES	JON B. ELLIS <i>Retained</i> 2108329090 x2108024131(W)

EVENTS & ORDERS OF THE COURT

	OTHER EVENTS AND HEARINGS
01/31/2020	Civil Case Filed (OCA)
01/31/2020	Original Petition
	PLAINTIFFS ORIGINAL PETITION, REQUEST FOR DISCLOSURE, LOURDES RODRIGUEZ DE GONZALEZ'S FIRST SET OF INTERROGATORIES TO DEFENDANTS & LOURDES RODRIGUEZ DE GONZALEZ S FIRST REQUEST FOR PRODUCTION TO DEFENDANTS. (SD)
02/04/2020	Jury Demand
	JURY DEMAND PAID BY ATTORNEY JON B. ELLIS. (SD)
02/04/2020	Calendar Call
	FAXED CALENDAR CALL TO ATTORNEY JON B. ELLIS. (SD)
02/05/2020	Notes-Miscellaneous
	AS PER ATTORNEY JOH ELLIS, ONLY ONE CITATION IS NECESSARY AT THIS TIME FOR GERMAN RIOS JR. & CARLOS SANCHEZ COLLECTIVELY D/B/A C & G TRUCKING. REQUESTING CITATION AS TO CARLOS SANCHEZ COLLECTIVELY D/B/A C & G TRUCKING BY

SERVING THE GENERAL PARTNERS GERMAN RIOS JR. (SD)

02/05/2020 Citation-Issuance

(2) CITATIONS ISSUED AS TO JIT TRANSPORT LLC BY SERVING ITS REGISTERED AGENT SHETUL B. MUCHHALA. PLACED ON PRIVATE SERVER BASKET. (SD)

02/05/2020 Citation-Issuance

(2) CITATIONS ISSUED AS TO ASHIRWAD GROUP LLC BY SERVING ITS REGISTERED AGENT SHETUL B. MUCHHALA. PLACED ON PRIVATE SERVER BASKET. (SD)

02/05/2020 Citation-Issuance

(2) CITATIONS ISSUED AS TO GERMAN RIOS JR.. PLACED ON PRIVATE SERVER BASKET. (SD)

02/05/2020 Citation-Issuance

(2) CITATIONS ISSUED AS TO CARLOS SANCHEZ. PLACE ON PRIVATE SERVER BASKET. (SD)

02/05/2020 Citation-Issuance

(2) CITATIONS ISSUED AS TO RAUL RAMIREZ. PLACED ON PRIVATE SERVER BASKET. (SD)

02/05/2020 Citation-Issuance

(2) CITATIONS ISSUED AS TO WEEKS MARINE, INC. BY SERVING ITS REGISTERED AGENT THOMAS P BOYNTON. PLACED ON PRIVATE SERVER BASKET. (SD)

02/05/2020 Citation-Issuance

(2) CITATIONS ISSUED AS TO GERMAN RIOS JR & CARLOS SANCHEZ COLLECTIVELY D/B/A C & G TRUCKING BY SERVING THE GENERAL PARTNERS GERMAN RIOS JR.. PLACE ON PRIVATE SERVER BASKET. (SD)

02/05/2020 Citation

GERMAN RIOS JR. & CARLOS SANCHEZ Served 02/14/2020
Returned 03/04/2020

02/05/2020 Citation

WEEKS MARINE INC. Served 02/13/2020
Returned 02/18/2020

02/05/2020 Citation

RAMIREZ, RAUL Served 02/12/2020
Returned 02/18/2020

02/05/2020 Citation

SANCHEZ, CARLOS Served 02/15/2020
Returned 03/04/2020

02/05/2020 Citation

RIOS JR., GERMAN Served 02/15/2020
Returned 03/04/2020

02/05/2020 Citation

ASHIRWAD GROUP LLC Unserved

02/05/2020 Citation

JIT TRANSPORT LLC Unserved

02/18/2020 Citation Return-Executed

CITATION RETURNED EXECUTED AS TO WEEKS MARINE INC. DATE OF SERVICE 02/13/2020

02/18/2020 Citation Return-Executed

CITATION RETURNED EXECUTED AS TO RAUL RAMIREZ. DATE OF SERVICE 02/12/2020

03/04/2020 Citation Return-Executed

CITATION RETURN EXECUTED AS TO GERMAN RIOS, JR. (DATE OF SERVICE 02/15/2020)

03/04/2020 Citation Return-Executed

CITATION RETURN EXECUTED AS TO CARLOS SANCHEZ (DATE OF SERVICE 02/15/2020)

03/04/2020 Citation Return-Executed

CITATION RETURN EXECUTED AS TO GERMAN RIOS JR. & CARLOS SANCHEZ COLLECTIVELY D/B/A C&G TRUCKING BY SERVING THE GENERAL PARTNERS (DATE OF SERVICE 02/14/2020)

03/05/2020 Letter

LETTER FROM PARALEGAL KIMBERLY S. PELS (DATED 03/05/2020) RE: CERTIFIED COPIES OF ALL PLEADINGS, INCLUDING ALL CITATIONS AND SERVICE DOCUMENTS.

03/05/2020 Notes-Miscellaneous

CALLED KIMBERLY PELS RE: CERTIFIED COPIES. KIMBERLEY STATED THEY WERE REQUESTING THE WHOLE FILE, WHICH INCLUDES 67 PAGES, AND WILL BE PAYING BY SENDING A CHECK THROUGH MAIL.

03/06/2020 Letter

LETTER FROM PARALEGAL KIMBERLY S. PELS RE: PAYMENT FOR CERTIFIED COPIES. ATTACHED WITH SELF-ADDRESSED ENVELOPE. (FEES PAID)

03/06/2020 Notes-Miscellaneous

CERTIFIED COPIES AND RECEIPT MAILED IN SELF ADDRESSED ENVELOPE VIA FEDEX EXPRESS. PICK UP NUMBER: LRDA68

04/15/2020 Calendar Call (1:30 PM) (Judicial Officer Palomo, Beckie)

ATTACHMENT 3

LIST OF COUNSEL OF RECORD

Defendant, Weeks Marine, Inc. (“Weeks Marine”), in accordance with Local Rule 81, submits the following list of counsel of record and parties represented:

1. **Plaintiffs:**

MA LOURDES GONZALEZ

LOURDES RODRIGUEZ DE GONZALEZ

ROBERT GONZALEZ ANCIRA, INDIVIDUALLY AND AS
REPRESENTATIVE OF THE ESTATE OF ROBERTO GONZALEZ JR.

through their counsel of record:

Sadovsky & Ellis, PLLC

Jon B. Ellis (State Bar No. 24080878)

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and

THE ARMSTRONG FIRM, PLLC

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Plaintiffs:

LESLYLE GONZALEZ

CYNTHIA GONZALEZ

LAURA GATICA

through their counsel of record:

THE CARLSON LAW FIRM

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2. **Defendants:**

WEEKS MARINE, INC.

RAUL RAMIREZ

through their counsel of record:

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Jefferson R. Tillery (SDTX #295817)

C. Barrett Rice (SDTX #815456)

Jennifer A. David (SDTX #3229371)

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and

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E-Mail: jquin@joneswalker.com

3. **Parties Believed to Be Represented:**

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ASHIRWAD GROUP LLC
through their counsel of record:
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4. **Parties Unrepresented:**

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GERMAN RIOS, INDIVIDUALLY AND
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